

In The Matter Of:
Melinda and Mark Loe, et al vs.
Willie Jett, et al

UNIV. OF NORTHWESTERN DESIGNEE - ANITA CLINE-COLE
January 30, 2024

Anita Cline-Cole - Univ. of Northwestern - St. Paul Designee - 1-30-24

Shaddix & Associates
7400 Lyndale Avenue South
Suite 190
Richfield, MN 55423

1 UNITED STATES DISTRICT COURT
 2 DISTRICT OF MINNESOTA
 3 -----
 4 Court File No. 23-cv-1527 (NEB/JFD)
 5 Melinda and Mark Loe, on their
 6 behalf and as next friends of their
 7 children R.L. and O.L.; Dawn Erickson,
 8 on her own behalf and as next friend of
 9 her child J.G.; Crown College; and
 10 University of Northwestern - St. Paul,
 11 Plaintiffs,
 12 vs.
 13 Willie Jett, in his official capacity as
 14 Minnesota Commissioner of Education;
 15 and Minnesota Department of Education,
 16 Defendants.
 17 -----
 18 DEPOSITION and EXHIBITS of UNIVERSITY
 19 OF NORTHWESTERN - ST. PAUL by ANITA CLINE-COLE, taken
 20 pursuant to Federal Rule of Civil Procedure 30(b)(6) in
 21 the above-styled cause pursuant to Notice at Suite 1100,
 22 445 Minnesota Street, City of Saint Paul, County of
 23 Ramsey, State of Minnesota, before Colleen M. Sichko,
 24 Registered Professional Reporter, Stenographic reporter
 25 and notary public, on the 30th day of January, 2024,
 commencing at approximately 10:00 a.m.
 * * *

Page 2
 1 APPEARANCES:
 2 ERIC BAXTER, BEN FLESHMAN, DIANE
 3 THOMSON and ANDREA BUTLER, Attorneys at Law, THE
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 8 and RICHARD C. LANDON, Attorney at Law, LATHROP GPM,
 9 Suite 3100, 80 South Eighth Street, Minneapolis,
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 11 appeared as counsel for and on behalf of the
 12 plaintiffs.
 13 JEFFREY TIMMERMAN and MADELEINE
 14 DEMEULES, Assistant Attorneys General, OFFICE OF
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 17 jeffrey.timmerman@ag.state.mn.us and
 18 madeleine.demeules@ag.state.mn.us, appeared as
 19 counsel for and on behalf of the defendants.
 20
 21
 22
 23 (Whereupon, the following proceedings
 24 were duly had, and entered of record, to-wit:)
 25

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1 (Whereupon, Minnesota Statutes 486.10,
2 Chapter 215, was complied with.)
3 ANITA CLINE-COLE,
4 having been first duly sworn, was
5 examined and testified on her oath as follows:
6 **EXAMINATION**
7 **BY MR. TIMMERMAN:**
8 Q. Good morning. We just met informally. My name is
9 Jeff Timmerman and I'm one of the lawyers
10 representing the Department of Education and
11 Commissioner Jett in the lawsuit that we're here for
12 today.
13 Could you just state your full name for
14 the record?
15 **A. Sure, Anita June Cline-Cole.**
16 Q. And you understand that you're here today to testify
17 on behalf of the University of Northwestern -
18 St. Paul?
19 **A. Yes.**
20 Q. Is it okay if I just refer to that as "Northwestern"
21 today?
22 **A. Yes, that's exactly how we refer to it.**
23 Q. Good. I had an acronym, but it's too clunky, so
24 that's great. And what is your position at
25 Northwestern?

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1 **A. I currently serve as the associate vice president**
2 **for admissions.**
3 Q. Have you ever given a deposition before?
4 **A. No.**
5 Q. Okay. I'm going to go over just a couple of ground
6 rules kind of to keep us on the same page today and
7 keep us moving. The first is, try not to talk over
8 each other. So if you let me finish my question,
9 I'll try and let you finish your answer. Does that
10 sound good?
11 **A. Yes.**
12 Q. Okay. The second is that this is not a marathon, so
13 if you need to take a break at any point, just let
14 me know. Okay?
15 **A. Mm-hmm.**
16 Q. Third is that I am not trying to trick you today and
17 lawyers have a tendency to ask bad questions or
18 confusing questions, and I probably will today at
19 some point. If you don't understand what I've asked
20 you, just tell me and I'll try and ask it a better
21 way. Okay?
22 **A. Okay.**
23 Q. And the last thing I would say is that sometimes it
24 happens that you give an answer and then, later on
25 in the day, you might remember additional

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1 information relating to an earlier answer. If that
2 happens today, just let me know. Okay?
3 **A. Okay.**
4 Q. And the last thing I will tell you is I don't want
5 to know about anything that you spoke to your
6 lawyers about.
7 **A. Okay.**
8 Q. They will be diligent in protecting that, as well,
9 but just to make that clear that I'm not inquiring
10 today about any communications that you've had with
11 the lawyers representing the school in this lawsuit.
12 Okay?
13 **A. Okay.**
14 Q. What did you do to prepare for your deposition
15 today?
16 **A. I did meet with my attorneys. We met via Zoom twice**
17 **and then once in person. I also spoke to members of**
18 **the Northwestern community. Specifically, I spoke**
19 **with our academic provost and also the president,**
20 **Corbin Hoornbeek. I spoke with the director of the**
21 **academic program for PSEO.**
22 Q. Okay. Who is that?
23 **A. Heidi Hoefs, and then one last person from our**
24 **student life community, Cory Wilder.**
25 Q. Cory Wilder?

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1 **A. Yes.**
2 Q. And do you know how you spell the first name?
3 **A. Cory, C-o-r-y, and Wilder, W-i-l-d-e-r.**
4 Q. And what is Cory Wilder's position?
5 **A. He currently serves as the associate dean for**
6 **student activities, so student life and activities,**
7 **something related to that.**
8 Q. And who is the provost?
9 **A. Janet Sommers, so Dr. Janet Sommers. Last name is**
10 **spelled S-o-m-m-e-r-s.**
11 Q. And Mr. Hoornbeek or Dr. Hoornbeek is the president,
12 correct?
13 **A. Yes.**
14 Q. And these conversations that you had with these
15 individuals, were your lawyers present for any of
16 those?
17 **A. No.**
18 Q. Okay. And what did you discuss with Provost
19 Sommers?
20 **A. We talked about the Declaration of Christian**
21 **Community, and I wanted to hear from his perspective**
22 **why he believed in the declaration as the head of**
23 **the institution.**
24 Q. That was with President Hoornbeek?
25 **A. With president Hoornbeek, yes.**

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1 Q. So you spoke about the Declaration of Christian
 2 Community with President Hoornbeek. Anything else
 3 that you discussed with him to prepare for today?
 4 A. No.
 5 Q. And what about with Dr. Sommers?
 6 A. Dr. Sommers, we talked about the course offerings
 7 through our PSEO program and the clarity and
 8 understanding of how we determined if a course is
 9 sectarian or nonsectarian.
 10 Q. And what about with Heidi Hoefs -- Hoefs, am I
 11 pronouncing --
 12 A. Hoefs, yes. Heidi works directly with curriculum
 13 and course outcomes, so we went into a more detailed
 14 conversation about some specific courses and those
 15 curriculum -- curricula.
 16 Q. And, lastly, what about Cory Wilder --
 17 MR. BAXTER: And I'm just going to
 18 remind you not to disclose anything you might have
 19 learned discussed with counsel in that meeting, but
 20 anything that you spoke about with Mr. Wilder.
 21 THE WITNESS: Yes. So with Cory, we
 22 talked about student engagement and general student
 23 life experience at Northwestern.
 24 BY MR. TIMMERMAN:
 25 Q. Thank you. And aside from these four individuals

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1 and, again, not intending to implicate any
 2 discussions that you've had with your lawyers, who
 3 else at Northwestern have you discussed the lawsuit
 4 with or the change to the PSEO law?
 5 A. No one else.
 6 Q. And does Heidi Hoefs -- does she report directly to
 7 you?
 8 A. No, she reports to an associate dean, who also, in
 9 turn, reports to the provost, Janet Sommers.
 10 Q. And what about Cory -- Mr. Wilder, does he report to
 11 you?
 12 A. No.
 13 Q. Who does he report to?
 14 A. He reports to the vice president for student
 15 experience or student life.
 16 Q. Thank you. Do you know how "discrimination" is
 17 defined in Northwestern's policies?
 18 A. I cannot give a response to that because that's not
 19 a term that we use. It's not in our policy.
 20 Q. Okay. You don't have an antidiscrimination policy
 21 that you're aware of?
 22 A. If there is any mention of discrimination in our
 23 policy, it is related to student care, where we say
 24 that students will all be treated equally with
 25 respect and care and love.

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1 Q. And do you know whether not using "discrimination"
 2 was a decision that someone made or is it a policy
 3 decision? Are you aware of any background there?
 4 A. No.
 5 MR. BAXTER: Object as outside the
 6 scope.
 7 You can answer if you know.
 8 BY MR. TIMMERMAN:
 9 Q. Does Northwestern permit race discrimination?
 10 A. No.
 11 Q. Does Northwestern permit sex discrimination?
 12 A. No.
 13 Q. What about age discrimination?
 14 A. No.
 15 Q. National origin discrimination?
 16 A. No.
 17 Q. Disability discrimination?
 18 A. No.
 19 Q. Does Northwestern permit any discrimination?
 20 A. No.
 21 Q. Would you agree that Northwestern excludes PSEO
 22 students who aren't Christian?
 23 A. I will not agree to that, no.
 24 Q. Okay. And why not?
 25 A. Now, Northwestern has three venues where we offer

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1 PSEO and our online venue is open to students of all
 2 faith, all belief and all creed. We have about
 3 1,300 students who take our online program and over
 4 half of those students do not have a Christian faith
 5 belief.
 6 Q. And how do you know that, or how does Northwestern
 7 know that?
 8 A. We have a report that we run on a yearly basis to
 9 get an understanding of our students and where they
 10 come from.
 11 Q. Do you run that same kind of report for students who
 12 attend on campus?
 13 A. We do not, no.
 14 Q. Would you agree that Northwestern excludes PSEO
 15 students who aren't Christian from attending
 16 on-campus PSEO courses?
 17 A. I would agree, but I would clarify that there is a
 18 distinction between a student identifying as one
 19 religion versus a student following our Declaration
 20 of Christian Community.
 21 Q. You would agree, though, that a student has to --
 22 for example, if you're a Muslim student or a Jewish
 23 student and you want to take PSEO courses on campus
 24 at Northwestern, you have to proclaim in writing
 25 that Jesus Christ is Lord, correct?

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1 **A. That is correct, yes.**
 2 Q. And if you're a gay student and you want to attend
 3 on-campus PSEO courses at Crown, you have to agree
 4 not to be in an intimate same-sex relationship,
 5 correct?
 6 **MR. BAXTER:** Objection just to the
 7 extent that the question is vague and lacks
 8 foundation.
 9 **BY MR. TIMMERMAN:**
 10 Q. I'm sorry, and your answer?
 11 **A. I'm sorry, just to clarify, Northwestern?**
 12 Q. Correct.
 13 **A. A student, every student, regardless of their sexual**
 14 **orientation, regardless of their identity, are**
 15 **required to sign a faith statement and complete the**
 16 **full application process in order to participate in**
 17 **our on-campus and our online -- I'm sorry, our**
 18 **on-campus PSEO program.**
 19 Q. Okay. And one of the provisions of that declaration
 20 says that you can't -- if you're a gay student, you
 21 can't have an intimate relationship with another
 22 person of your same sex, correct?
 23 **A. That is correct, yes.**
 24 Q. Are heterosexual people, PSEO students, taking
 25 on-campus classes allowed to date?

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1 **A. Students are allowed to date, it's just that what we**
 2 **ask is that they align and their behavior aligns**
 3 **with what's written in our declaration.**
 4 Q. And how is the term "intimate relationship" defined
 5 in the declaration? What does that mean?
 6 **A. "Intimate relationship," by the Declaration of**
 7 **Christian Community, is a consensual relationship**
 8 **between male and female.**
 9 Q. Okay. And is that a sexual relationship? a
 10 nonsexual relationship?
 11 **A. Well, if we're talking about intimate, yes, we**
 12 **relate it to a sexual relationship, yes.**
 13 Q. Okay. Does Northwestern admit gay students who are
 14 married?
 15 **A. Not to my knowledge, because we have never received**
 16 **an application from a gay student who is married.**
 17 Q. Would you agree that if you're transgender -- do you
 18 understand the use of the word "transgender" here?
 19 **A. Yes.**
 20 Q. What does that term mean to you?
 21 **A. Please forgive me if I don't sound -- if I don't use**
 22 **the correct terminology, but my understanding is**
 23 **it's a student -- it's an individual who has made a**
 24 **choice to live a lifestyle that is separate from**
 25 **their biological gender. Is that correct?**

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1 Q. Okay. So their gender identity --
 2 **A. Yes.**
 3 Q. -- is different than their biological --
 4 **A. Than their biological, yes.**
 5 Q. Are you familiar at all with gender dysphoria?
 6 **A. From my past personal readings, yes.**
 7 Q. And what is that, per your understanding?
 8 **A. This is an individual who would have challenges with**
 9 **their gender, their biological gender, and will feel**
 10 **uncomfortable in their own gender of birth.**
 11 Q. Are you familiar at all with the "DSM"?
 12 **A. No.**
 13 Q. Okay. Are you aware that gender dysphoria is a
 14 "DSM" diagnosis?
 15 **A. Could you help clarify what "DSM" is?**
 16 **MS. DEMEULES:** It's the "Diagnostic
 17 Statistical Manual."
 18 **BY MR. TIMMERMAN:**
 19 Q. It's the "Diagnostic --" I always forget that
 20 acronym. It's the "Diagnostic Statistical Manual."
 21 I believe we're on version 5 now, and it's a version
 22 of recognized mental health diagnoses from
 23 professionals, kind of a universal standard of
 24 diagnoses that the professional community has
 25 approved. Have you ever heard of that before?

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1 **A. No, I have not.**
 2 Q. Is it fair to say that Northwestern doesn't want gay
 3 students on campus?
 4 **MR. BAXTER:** Objection.
 5 Go ahead and answer if you'd like.
 6 **THE WITNESS:** I think it is unfair to
 7 say that Northwestern does not want gay students on
 8 campus.
 9 **BY MR. TIMMERMAN:**
 10 Q. Okay. And why is that?
 11 **A. Northwestern is a welcoming, loving community and we**
 12 **embrace every student regardless of their identity.**
 13 **However, going back to our foundation and the ethos**
 14 **of the Christian institution, the institution was**
 15 **formed on specific guidelines and biblical**
 16 **principles. We ask that every member of the**
 17 **Northwestern community follow those principles. We**
 18 **do not -- we embrace, like I said, every student as**
 19 **long as they can follow those specific principles by**
 20 **declaration.**
 21 Q. And those principles in the declaration do place
 22 some limits on a gay student's ability to live;
 23 would you agree with that?
 24 **MR. BAXTER:** Objection,
 25 mischaracterizes.

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1 But you can answer if you'd like.
 2 **THE WITNESS:** So a gay student who has
 3 signed a declaration and has agreed to follow those
 4 principles, those biblical principles, those
 5 students have thrived at Northwestern.
 6 **BY MR. TIMMERMAN:**
 7 Q. Would you agree that if you're a transgender high
 8 school student and you want to attend PSEO courses
 9 on campus at Northwestern, that you can't dress in a
 10 manner that corresponds to your gender identity?
 11 A. I cannot speak to that because our students are very
 12 creative and I have seen students dress in different
 13 manners and form that is suitable for them when they
 14 wake up in the morning on that day and there has not
 15 been any judgment, not to my knowledge.
 16 Q. Have you ever seen or heard of a student dressing in
 17 a manner that is the opposite of their biological
 18 sex?
 19 A. Yes.
 20 Q. Okay. And is that, like, for an event or on a daily
 21 basis? Can you explain a little?
 22 A. I have seen students on a daily basis and some
 23 students for events, as well.
 24 Q. And on a daily basis, students were allowed by
 25 Northwestern to dress in that manner?

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1 A. Yes, as long as the student feels comfortable. I
 2 have not heard of any situation where a student was
 3 told to change their outfit if that's how they felt
 4 that day.
 5 Q. Are you aware of any transgender students who have
 6 attended Northwestern?
 7 A. No, I'm not.
 8 Q. Or applied?
 9 A. Not to my knowledge.
 10 Q. Is it fair to say that Northwestern doesn't want
 11 students of other faiths on its campus?
 12 A. No.
 13 Q. And why not?
 14 A. We have students who join the community, sign the
 15 statement of faith and have various opinions about
 16 religion. However, these students still continue to
 17 participate in the Northwestern community where --
 18 on the traditional side, still choose to attend
 19 chapel and join the community to build this
 20 spiritual -- help with the spiritual development.
 21 So we have some situations like that where, from
 22 personal conversation, that student may have a
 23 different opinion; however, they want to experience
 24 the Christian faith and abide by the declaration.
 25 Q. And how do you know this?

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1 A. This is just personal conversations that I have had
 2 with some students.
 3 Q. Okay. And could you describe those conversations,
 4 and I want to make clear I don't want to know
 5 student names --
 6 A. Sure, absolutely. Absolutely.
 7 Q. I don't want to get into FERPA.
 8 A. Oh, yeah, absolutely. Yeah, it varies. It could be
 9 different denominations within the Christian faith.
 10 It could be even just their position at the time,
 11 their -- I believed before and now I don't know or
 12 just a different journey or timeline in their lives
 13 where I've had a couple of students say I'm
 14 wrestling with this, I'm not sure.
 15 But I will say that these students have
 16 the posture of wanting to be part of the community
 17 and wanting to grow spiritually.
 18 Q. Are all of these students Christian, just at various
 19 stages of their Christianity?
 20 A. At the point of application, when they submitted
 21 their application, as far as my position as when I
 22 served as director of admissions, they were
 23 Christian.
 24 Q. Okay. Are you aware of any Muslim students
 25 attending PSEO on campus at Northwestern?

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1 A. Not to my knowledge, not any of the students that
 2 I've spoken to directly.
 3 Q. Are you aware of any Jewish students attending PSEO
 4 on campus at Northwestern?
 5 A. I am -- I'm not aware, no.
 6 Q. Okay, thank you. Let's talk a little bit about your
 7 background. So let's start with your current
 8 position. How long have you been the AVP -- in the
 9 AVP role?
 10 A. Yes, so as of December 2022.
 11 Q. And who do you report directly to?
 12 A. To the vice president of enrollment and marketing.
 13 His name is Erick Klein.
 14 Q. How many people report to you?
 15 A. Directly, four.
 16 Q. And who are they?
 17 A. Two directors, so one is the director of admissions
 18 for our traditional college. Do you need the names
 19 of these individuals?
 20 Q. That would great, yeah.
 21 A. Okay, Kyle Peach; then there is the director of
 22 nontraditional admissions, so nontraditional
 23 includes PSEO, as well as adult completion and our
 24 graduate program, so that is Tami Treder; and then
 25 there is the assistant director of operations,

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1 behind the scenes I call her, so she is Hannah
 2 Anderson; and then there's the assistant director of
 3 events, Morgan Peterson.
 4 Q. And what did you do before you were the AVP at
 5 Northwestern?
 6 A. I was the senior director of operations for
 7 enrollment. So I served in that role for about a
 8 year.
 9 Q. Who did you report to in that role?
 10 A. Erick Klein, who is the vice president.
 11 Q. And prior to the senior director position, what was
 12 your position?
 13 A. Yes, I was the director of nontraditional
 14 admissions, so where I -- part of my work was to
 15 oversee PSEO admissions, as well as our nondegree
 16 completion programs and our graduate programs.
 17 Q. Is that the job that Tami Treder has now?
 18 A. Yes.
 19 Q. Okay. What about before Northwestern, where did you
 20 work?
 21 A. Before Northwestern, I was at St. Catherine
 22 University for seven years.
 23 Q. Great. What did you do there?
 24 A. I served as the assistant director for admissions
 25 for our graduate programs.

Page 22

1 Q. Did you teach there at all?
 2 A. I did, yes.
 3 Q. What kinds of courses?
 4 A. It's an English course, more like a comprehensive
 5 writing course, helping students transition from
 6 writing at the high school level to the college
 7 level. I still teach at St. Kate's.
 8 Q. Oh, you do?
 9 A. Mm-hmm.
 10 Q. I have a friend who is the head of the
 11 Communications Department there.
 12 A. Okay.
 13 Q. And what about before St. Kate's, where were you at?
 14 A. I was at Northwestern.
 15 Q. Okay.
 16 A. And I was an admission counselor for our
 17 multicultural student recruitment program, and I did
 18 that for two years.
 19 Q. Was that your first role out of college?
 20 A. I did part-time here and there raising my boys, but
 21 yes, the first full-time job out of college.
 22 Q. And you have a bachelor's degree from Northwestern?
 23 A. I do, yes.
 24 Q. In marketing?
 25 A. Yes.

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1 Q. You also have a master's in higher education
 2 administration?
 3 A. Yes.
 4 Q. And that's from St. Cloud State?
 5 A. Mm-hmm.
 6 Q. Where did you go to high school?
 7 A. Outside the country --
 8 Q. Okay.
 9 A. -- in Sierra Leone, Africa.
 10 Q. I was wondering if you did PSEO, but it sounds like
 11 no.
 12 A. I probably would have.
 13 Q. What does Northwestern do to protect students who
 14 may have wavering faith beliefs or who may express
 15 nonChristian beliefs --
 16 A. Yes.
 17 Q. -- from discrimination?
 18 A. Yes. So we have a very robust caring community that
 19 is housed in student life and the main goal is to
 20 help that student feel welcome, feel loved, feel
 21 cared for, and where there's never a form of them
 22 experiencing bullying in any way. If the student so
 23 chooses, they will be referred to a counseling
 24 service, so these are professional counselors that
 25 work at Northwestern to help students in any

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1 challenge that they are experiencing related to
 2 mental health, related to even struggles with their
 3 academic work and their personal lives.
 4 Q. And is it the same process for students who are
 5 LGBTQ?
 6 A. Yes.
 7 Q. So LGBTQ students can seek counseling services, as
 8 well?
 9 A. Yes.
 10 Q. And is that one-on-one therapy that's provided?
 11 A. I am not sure how that works, but my understanding
 12 is that most of these are confidential. My
 13 understanding is that they do have access to our
 14 counseling services, yes.
 15 Q. Do you know what the credentials are of the
 16 individuals who provide those services?
 17 A. I cannot -- I don't know. It's on our website,
 18 yeah.
 19 Q. Okay. Do you know what conversion therapy is?
 20 A. I have heard of it, yes.
 21 Q. And what do you understand that to be?
 22 A. This is a therapy where an individual who has
 23 expressed the desire or who has chosen to live -- if
 24 we're talking about more on the place of gender,
 25 that's separate from -- that's different from their

Page 25

1 gender of birth, they go through a therapy where
 2 it's supposed to be reversed to say if a student
 3 identifies -- I'm sorry, I'm mumbling. I'm just
 4 kind of --
 5 Q. You're fine.
 6 A. So if a student were to -- I'll say Anita. If Anita
 7 identifies as male and I -- and then there's a
 8 therapy that I have to go through to help me feel as
 9 though that's not the right gender and I need to go
 10 back to the gender of my birth. At least that's my
 11 understanding of it.
 12 Q. Does Northwestern provide any therapy like that?
 13 A. I --
 14 **MR. BAXTER:** Objection, outside the
 15 scope.
 16 You can answer if you know.
 17 **THE WITNESS:** I've never heard --
 18 that's why I struggle with defining it, because I
 19 have never heard of that at Northwestern.
 20 **BY MR. TIMMERMAN:**
 21 Q. Have you ever heard of any counseling provided to
 22 gay students to help them not be gay?
 23 A. No.
 24 Q. You mentioned that you spoke with Dr. Sommers about
 25 sectarian and nonsectarian, correct?

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1 A. Yes.
 2 Q. How does Northwestern define nonsectarian?
 3 **MR. BAXTER:** Objection, this is outside
 4 the scope of the notice.
 5 But you can answer if you know.
 6 **THE WITNESS:** So we define nonsectarian
 7 from the definition that's given to us by the
 8 Minnesota Department of Education. I'm trying to
 9 remember the people it points out. This is not my
 10 area of expertise; I'm more on the admissions side,
 11 enrollment, and not on the academic side.
 12 The three bullet points, as I can
 13 recall is, the first one is if the course's
 14 intention is to train the individual to go into a
 15 vocation of some kind of religion, the second point
 16 is where the course has an affiliation to a specific
 17 religion or based on a specific religion, and then I
 18 can't recall the third point.
 19 **BY MR. TIMMERMAN:**
 20 Q. And are all of the PSEO courses offered at
 21 Northwestern nonsectarian?
 22 A. Yes.
 23 **MR. BAXTER:** Objection just to the --
 24 this -- form of the question.
 25 **BY MR. TIMMERMAN:**

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1 Q. I want to pivot here -- and we've been going about
 2 35 minutes -- to Northwestern's denominational
 3 affiliation. I don't have a better term. Could you
 4 just explain to me kind of the -- I understand that
 5 Northwestern is part of a cohort of other religious
 6 institutions.
 7 A. Mm-hmm.
 8 Q. I don't know what that's called, but if you could
 9 explain that to me, that would be helpful.
 10 A. So Northwestern is nondenominational; however, the
 11 foundation is from the Pentecostal evangelical
 12 tradition, but the institution is nondenominational.
 13 Q. Okay. And when you say -- I understand Pentecostal
 14 tradition, but when you say evangelical tradition,
 15 is there a particular sect of Christianity that
 16 you're referencing there?
 17 A. It's biblically based, so evangelical is mostly
 18 everything that -- we see the Bible as the final
 19 authority in a matter that we should conduct our
 20 personal lives, yeah.
 21 Q. And view the Bible as inerrant, as well?
 22 A. Yes.
 23 Q. Is there a particular version of the Bible that
 24 Northwestern has adopted as its source text?
 25 A. No.

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1 Q. And is Northwestern affiliated with other either
 2 religious schools, houses of worship, any other
 3 religious institutions in any manner?
 4 A. No affiliation; however, we have a board of trustees
 5 that come from the nondenominational sector.
 6 Q. You're not a member of any cohort of Christian
 7 schools or Christian institutions?
 8 A. No.
 9 Q. Do you know what the HLC is?
 10 A. Yes.
 11 Q. What does that mean?
 12 A. It's the Higher Learning Commission.
 13 Q. And what is the Higher Learning Commission?
 14 A. It's an accrediting body from the North Central
 15 Association of Colleges and Schools where
 16 Northwestern receives accreditation for academic
 17 pedagogical offerings, program offerings.
 18 Q. Is Northwestern a member of the North Central
 19 Association of Colleges and Schools?
 20 A. Yes.
 21 Q. What other institutions belong to that association?
 22 A. Yeah, I believe it's most institutions, so
 23 St. Catherine University for one. So most of the
 24 universities in the Twin Cities area. So the
 25 accreditation is regional. It's regional to

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1 institutions, private liberal arts institutions in
 2 the Midwestern region.
 3 Q. And are those institutions of various different
 4 denominations and faiths or are they all Christian?
 5 How does that work?
 6 A. No, it's purely based on academia based on the
 7 integrity of the academic program offerings. I
 8 believe institutions in the Twin Cities like
 9 Carleton in Northfield, Macalester are all part of
 10 the HLC accreditation body.
 11 Q. And so I'm going to use a couple terms and if you
 12 don't understand them, please let me know. Is
 13 Northwestern a confessional or a covenant
 14 organization?
 15 A. Covenant.
 16 Q. Do you know, is there a difference between
 17 confessional and covenant that you're aware of?
 18 A. Yeah, I'm trying to recall. I could be off here,
 19 but my understanding is an institution that is
 20 covenant is the one where members of the community
 21 are expected to abide by a certain ethos or where
 22 they have to sign a faith statement. So members
 23 include from the board of trustees to the
 24 presidential cabinet, administration, students,
 25 faculty, staff have to sign that declaration or a

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1 covenant in order to be part of that community.
 2 And confessional would be an
 3 institution that also has a faith-based standing,
 4 but has an open enrollment where, perhaps, the
 5 administration, faculty, staff have to sign a
 6 covenant; however, other members of the community do
 7 not.
 8 Q. Do you know what the doctrinal or biblical basis is
 9 for the covenant?
 10 A. Yeah, it's all based on -- so from the foundation,
 11 so going back to 1902, when the institution was
 12 established, it was Northwestern Bible College and a
 13 missionary training school based off of -- in
 14 Minneapolis. This is when this covenant was formed
 15 purely based on the intention of building and
 16 empowering Christians to grow in their faith and to
 17 go out into the world and be a representation of
 18 Christ.
 19 So the foundation of this covenant is
 20 based on our personal relationship with Jesus Christ
 21 and then also living a lifestyle that is honoring,
 22 God-fearing and contributing to society.
 23 Q. Are PSEO students expected to abide by all of these
 24 covenant promises, as well?
 25 A. No.

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1 Q. They are not? Which ones are they not required to
 2 abide by?
 3 A. So PSEO -- and I just want to make sure there's a
 4 distinction. So Northwestern offers PSEO programs
 5 or we participate in a PSEO program. We have
 6 intentionally opened PSEO to students of all faiths
 7 and all backgrounds and all creeds. So these are
 8 students who do PSEO on campus -- I'm sorry, online.
 9 Q. Yeah.
 10 A. Now, because the institution is a faith-based
 11 institution and it's an institution that everyone
 12 has to sign a covenant, so a student who chooses to
 13 participate in our on-campus program, they have to
 14 sign a declaration. By no means do we expect a
 15 16-year-old to live a certain lifestyle that for me,
 16 a mature woman in my 40s, should live because I
 17 understand and I have been a Christian for a long
 18 time.
 19 However, students who join our
 20 community, including on-campus PSEO students,
 21 understand that this is an institution and what our
 22 covenant is based on and these are students who
 23 willingly participate and want to be a part of that
 24 community. Families choose Northwestern because
 25 they see this as a place for spiritual growth and

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1 development.
 2 Q. In the Christian faith, correct?
 3 A. In the Christian faith, yes.
 4 Q. Do you expect -- I think you use the phrase
 5 "ambassadors of Christ" and I have seen that here in
 6 some of the papers that we'll go over, but are PSEO
 7 students who attend on-campus courses, are they
 8 expected to be ambassadors of Christ?
 9 A. PSEO students, not in that definition, but at least
 10 they are expected to -- this is when it comes to
 11 behavior and, in order to participate in the
 12 community, follow the behavior that's written in the
 13 declaration.
 14 Q. Thank you. You mentioned 1902 and I have -- that's
 15 a very long time ago. The covenant, to your
 16 knowledge, has been around since 1902?
 17 A. Yes, not explicitly how it is written. Some
 18 language has been added over time, but yes, the
 19 foundation of that was established in 1902.
 20 Q. Is that when Northwestern opened as an institution?
 21 A. Yes.
 22 Q. And to your knowledge, have students who take
 23 on-campus courses at Northwestern always been
 24 required to agree to a declaration or a covenant as
 25 part of their --

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1 A. Yes.
 2 Q. -- as part of attending courses?
 3 A. To my knowledge, yes.
 4 Q. Do you know if that declaration or covenant has
 5 changed over the years?
 6 A. I will say specific language was added after the
 7 George Floyd event and the emphasis on that was to
 8 underscore the importance of embracing, caring for
 9 and loving people of all backgrounds at the
 10 University.
 11 Q. Was there a particular reason -- other than the fact
 12 that George Floyd was murdered, is there a
 13 particular reason why the institution decided at
 14 that time to update the declaration?
 15 A. No. It was during the time, I believe, every
 16 organization, every industry was going through that
 17 moment of self-reflection.
 18 Q. Okay.
 19 A. And Northwestern wasn't excluded from that.
 20 Q. So beyond that modification of the declaration, do
 21 you know when it was last modified before that?
 22 A. No.
 23 Q. Have you ever seen the original covenant or
 24 declaration?
 25 A. I haven't, no.

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1 Q. Let's talk if we could a little bit about the
 2 leadership structure at Northwestern. I know
 3 Dr. Hoornbeek is the president of the institution.
 4 Do you know how long he's been there?
 5 A. August 2022, so he's fairly new.
 6 Q. And you mentioned a board of trustees?
 7 A. Yes.
 8 Q. How many people are on that board; do you know?
 9 A. I'm going to think about 13; could be less.
 10 Q. Do you know who leads the board of trustees?
 11 A. His name is Grover --
 12 Q. Sayers (phonetic)?
 13 A. No, he's an attorney of law. I'm trying to think of
 14 his last name. He's the chairman of the board, and
 15 that -- it changes every couple of years, so I -- I
 16 would have to find out his last name.
 17 Q. I've been on the school board before, so I kind of
 18 understand the function of a board --
 19 A. Yeah.
 20 Q. -- but is the board Dr. Hoornbeek's boss,
 21 essentially?
 22 A. Yes.
 23 Q. And then is there what you would consider to be like
 24 a senior leadership team at the college?
 25 A. Yes. So it used to be called senior leadership

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1 team. Now it's called the cabinet that's led by
 2 Dr. Hoornbeek.
 3 Q. And who else is on the cabinet?
 4 A. Various VPs. We have -- so there is Dr. Hoornbeek
 5 and then there is Erick Klein, who is the vice
 6 president for enrollment and marketing. There is
 7 Dale Engskov -- the specific spelling of his name is
 8 on our website also.
 9 Q. Okay.
 10 A. He is the vice president for advancement. There is
 11 Matt Hill, he's the director of the athletics
 12 department; and then our new vice president for
 13 student engagement and experience, his name is Bret
 14 Hyder; Senior Provost Janet Sommers, so she actually
 15 would be second in command after Dr. Hoornbeek; and
 16 then there is a senior vice president for media, his
 17 name is Jason Sharp; and one more, he is the chief
 18 financial officer, his name is John Sommerville.
 19 Q. Is Greg Johnson also --
 20 A. Oh, yes. So Greg Johnson is -- sorry.
 21 Q. It's okay.
 22 A. We always forget about Greg, poor Greg. So Greg
 23 Johnson is the chief of staff, yeah.
 24 Q. And what is the purpose of the cabinet, to your
 25 understanding?

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1 A. Sure. The cabinet, that's the leadership team of
 2 the institution and each member has a unit that they
 3 oversee, specifically departments, and their
 4 position is also to make decisions related to
 5 academia and sometimes the day-to-day running of the
 6 institution.
 7 Q. Sure. And does -- to your knowledge, does the
 8 cabinet have any involvement in PSEO?
 9 A. They do, yes. They have an involvement just because
 10 of the specific role of each cabinet member in order
 11 to ensure that their reports are following the
 12 standards set by the Minnesota Department of
 13 Education.
 14 Q. This was the nonsectarian standard we talked about
 15 before?
 16 A. Yes, yes.
 17 Q. And what about the board, do you know whether the
 18 board has any involvement in PSEO?
 19 A. I'm trying to think. Not directly, not to my
 20 knowledge.
 21 Q. That sounds about right, boards are usually a little
 22 higher level.
 23 A. Yeah.
 24 Q. Who is the highest-ranking person at the college
 25 with oversight of PSEO, like direct oversight?

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1 A. So direct oversight, on the academic side it would
 2 be Heidi Hoefs.
 3 Q. Okay. And what about on the financial side; do you
 4 know?
 5 A. It would be the chief financial officer.
 6 Q. John Sommerville?
 7 A. John Sommerville, yes.
 8 (Northwestern Deposition Exhibit 1 was
 9 marked for identification by the court
 10 reporter and attached hereto.)
 11 BY MR. TIMMERMAN:
 12 Q. Ms. Cline-Cole, I'm showing you -- and I apologize,
 13 are you a doctor, as well?
 14 A. No, not yet, on my way.
 15 Q. Oh, awesome, that's exciting. Ms. Cline-Cole, I'm
 16 showing you what's marked as Exhibit 1 to your
 17 deposition. Have you seen this document before?
 18 A. I have, yes.
 19 Q. Okay. And you understand that these are the topics
 20 that you're here to testify about today?
 21 A. Yes.
 22 Q. Okay. And do you feel like you're able to testify
 23 to all these topics?
 24 A. Yes.
 25 Q. You can set that aside; thank you.

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1 (Northwestern Deposition Exhibit 2 was
 2 marked for identification by the court
 3 reporter and attached hereto.)
 4 BY MR. TIMMERMAN:
 5 Q. I'm showing you what's been marked as Exhibit 2 to
 6 your deposition. Feel free to take a moment and
 7 review it. Back to my earlier point about not
 8 trying to trick you, I encourage you to read
 9 documents that I put in front of you and feel
 10 comfortable doing so.
 11 MR. BAXTER: Take as much time as you
 12 need.
 13 BY MR. TIMMERMAN:
 14 Q. Have you had a chance to review it?
 15 A. Mm-hmm.
 16 Q. So you will see in the bottom right-hand corner
 17 there are tiny little numbers and words or letters.
 18 Those are just labels that we use as lawyers to make
 19 sure that we're keeping our documents straight.
 20 So these are -- this is a Declaration
 21 of Christian Community from Northwestern, correct?
 22 A. Yes.
 23 Q. And is this the current declaration?
 24 A. Yes, it looks like it.
 25 Q. And does this entire document apply to students who

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1 take PSEO on campus?
 2 A. That's correct, yes.
 3 Q. And how long has that been the practice?
 4 A. Since we started offering PSEO on campus. I believe
 5 our first cohort was in 2012 for on-campus PSEO.
 6 Q. So 2012 was the first school year that Northwestern
 7 offered on-campus PSEO courses?
 8 A. Yes.
 9 Q. And prior to 2012, did Northwestern offer online
 10 PSEO courses?
 11 A. Yes.
 12 Q. Do you know why the decision was made to introduce
 13 on-campus?
 14 A. Yes. I believe, if I recall from talking to Heidi,
 15 it was because there were some parents who felt that
 16 they wanted their students to participate in the
 17 same classroom setting as all the traditional
 18 students.
 19 Q. Okay.
 20 A. And it was -- that first cohort we started with one
 21 student and then I think the following semester we
 22 had three other students apply for the on-campus
 23 program.
 24 Q. And it's just kind of exploded since then, right?
 25 A. It has, yes.

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1 Q. Do any of the current PSEO students actually live on
 2 campus?
 3 A. Yes. So we have students who -- we give them the
 4 option to stay on campus and they have to be at
 5 least 17 years old and a senior in high school. The
 6 number is small. Usually we get about maybe one or
 7 two a semester who express interest in living on
 8 campus and currently I think we have about -- a
 9 total of about eight PSEO on-campus students living
 10 in the residential dorms.
 11 Q. Eight currently living in the dorms?
 12 A. I believe so, yes.
 13 Q. And the others commute to and from?
 14 A. Yes.
 15 Q. And for the eight current who are living in a
 16 residential hall on campus, do you know, are they
 17 required to attend chapel or any other religious
 18 gathering?
 19 A. They are, yes.
 20 Q. And what are they required to attend?
 21 A. So there is a spiritual formation as part of the
 22 experience of living on campus -- living in the
 23 dorms, and I believe that spiritual formation
 24 credit, so to speak, not academically credit-bearing
 25 at all, and part of their spiritual growth and

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1 development, chapel is one of those requirements;
 2 and this is only for students who live in the dorms.
 3 Q. Okay. And I'm glad you raised the spiritual
 4 formation. I wanted to talk with you a little bit
 5 about that later --
 6 A. Sure.
 7 Q. -- just so I can get some clarity, and we'll look at
 8 a document about that.
 9 So this is only a requirement for
 10 students who are living on campus --
 11 A. On campus, yes.
 12 Q. -- and taking PSEO?
 13 A. Yes.
 14 Q. And how long has that been the practice?
 15 A. I don't know.
 16 Q. Are there consequences if the student doesn't
 17 complete their spiritual formation requirements?
 18 A. Not to my knowledge, no. The consequences for not
 19 completing the spiritual formation requirements are
 20 for traditional students because that attendance,
 21 chapel attendance, is credit-bearing. So
 22 traditional students who are tuition-paying do have
 23 a consequence of, okay, we're going to add three
 24 more chapel attendances or you're going to be
 25 required to do something else, but not, to my

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1 knowledge, for PSEO students on-campus residential
 2 students.
 3 MR. TIMMERMAN: We've been going about
 4 an hour now. Would you like to have a break?
 5 MR. BAXTER: I think it makes sense.
 6 (Short break taken from 10:59 t 11:12.)
 7 BY MR. TIMMERMAN:
 8 Q. So, Ms. Cline-Cole, when we left off, we were
 9 talking about the eight or so students who live on
 10 campus who are required to attend chapel for the
 11 spiritual formation program. I wanted to ask you
 12 about something different.
 13 Why does Northwestern require students
 14 who are on campus to agree to the declaration, but
 15 not students who take online classes?
 16 A. Absolutely. So the -- and this would be a cabinet
 17 decision and fundamentally a board decision where
 18 the program -- the institution wanted to open it to
 19 every student and that's how it started. So PSEO
 20 was always done through distant education, through
 21 online.
 22 Q. Okay.
 23 A. It included a request of some small community
 24 members, they asked if the students would be allowed
 25 to participate and take courses on campus. I

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1 believe, from talking to Heidi Hoefs, that's how the
 2 on-campus program was developed initially. So it
 3 was mostly by request, so one or two students, hence
 4 that small cohort and then, over time, more students
 5 wanted to have that opportunity. But these were
 6 families who felt that they would be a good fit for
 7 Northwestern based on its Christian foundation and
 8 then it kind of grew from that.
 9 Q. So Christian families who wanted on-campus --
 10 A. Yes, on-campus.
 11 Q. Okay. And with respect to the online PSEO
 12 community, is there a reason why a faith statement
 13 is not required for that group of students?
 14 A. I think, in order to stay consistent with the
 15 intention of the PSEO program, where the program
 16 was, again, available to every junior and senior
 17 from the state of Minnesota, the institution, I
 18 believe -- and, again, I'm trying to recall. I
 19 don't know the full history. I'm trying to recall
 20 the reason for the on-campus program offering to
 21 stay consistent, to continue offering online, but
 22 then as the campus program grew, they separated the
 23 two cohorts or two venues so to speak.
 24 Q. Okay, and I appreciate that. I'm just trying to
 25 understand, I guess, like, specifically why

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1 Northwestern doesn't require a faith statement from
 2 the online students. I understand that they
 3 separated and started an on-campus cohort back in
 4 2012, but why does Northwestern feel a faith
 5 statement is not important for online students?
 6 A. I wouldn't say it's not important, but again, it's
 7 the position, I believe, the institution took to
 8 have every student to have the opportunity, without
 9 the requirement of living a lifestyle according to
 10 the declaration, have an opportunity to participate
 11 in the PSEO program.
 12 Q. Do you know when the online PSEO program started?
 13 A. It was -- it has been offered for as long as the
 14 distance education program was available, I believe
 15 in the mid '90s. I don't have a specific year.
 16 Q. And are online PSEO students presented with the
 17 Declaration of Christian Community or is it sent to
 18 them or referenced to them in any way?
 19 A. Never, never.
 20 Q. Okay. Are they required to answer any questions
 21 during the admissions process about their faith?
 22 A. No.
 23 Q. You mentioned earlier that you do track the faith
 24 of --
 25 A. Mm-hmm.

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1 Q. -- online students, correct?

2 A. Yes.

3 Q. And is that through a voluntary disclosure process

4 that they go through?

5 A. Yes.

6 Q. Do you know when -- in 2012, when Northwestern

7 decided to begin offering on-campus PSEO, was there

8 any conversation with the Department of Education

9 about that change?

10 A. Not to my knowledge. I don't know.

11 Q. Is it fair to say that the Declaration of Christian

12 Community applies in the same respect to

13 undergraduate college students and PSEO on-campus

14 high school students?

15 A. It is fair to say, yes.

16 Q. Okay. Have you ever come to learn that some kids

17 prefer an on-campus educational setting versus a

18 virtual campus setting?

19 A. Yes.

20 Q. Okay. Can you tell me a little bit about that?

21 A. We have received applications from students who

22 started off online and -- usually it starts with a

23 conversation with their academic advisor and then

24 the advisor will explain to the student the process

25 for enrolling in the on-campus setting, so "the

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1 process" meaning separate -- well, not a separate

2 application, but these additional questions that the

3 student has to answer.

4 There is a higher academic rigor for

5 on-campus only because of the challenge sometimes of

6 driving to campus, working through your schedule,

7 navigating time management, so we have a higher

8 expectation for students who are doing on-campus

9 than for a student who is taking asynchronous online

10 courses, and this is strictly on the admissions

11 side.

12 So part of the conversation that the

13 academic advisor will have with that student is to

14 say, let's look at your GPA, where you're at right

15 now. The minimum GPA in order to stay in the

16 program is a 2.0 that an online student has to

17 maintain. For an on-campus student, they have to

18 maintain a 3.0 GPA, so there's a little bit more

19 rigor there. So there's a conversation about

20 academic standing and then also the spiritual fit,

21 as well.

22 Q. And what do you mean by "spiritual fit"?

23 A. It would be the conversation about the Declaration

24 of Christian Community.

25 Q. That's an important admissions criteria for

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1 Northwestern, correct?

2 A. For on-campus, yes.

3 Q. And of those students who you're familiar with who

4 requested to possibly transition from online to

5 on-campus, do you know why they wanted to make that

6 move?

7 A. Well, some students just -- I work on the enrollment

8 side, so I track this; and I will say my job is to

9 increase enrollment. That's how my performance is

10 measured, so I want students to continue enrolling

11 at Northwestern. Students who would have had some

12 classes, they would have engaged with professors, be

13 it online, and they really appreciated the

14 experience that they have had and generally want to

15 continue and they choose the on-campus option. We

16 generally see a high matriculation rate from those

17 students who join the on-campus community

18 matriculating to the traditional program.

19 Q. Is that one of the goals of the program, to increase

20 matriculation?

21 A. If you're asking an enrollment person, it would be

22 my goal. I don't know about the institution, but

23 yes, I would like to see students continue on into

24 our traditional program, yes.

25 Q. Do you know if any of those students who were

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1 considering a transition from online to on-campus

2 ever expressed that they just learn better in

3 person?

4 A. There are -- I believe there would be students in

5 that category, yes.

6 Q. Students with disabilities, for example, might learn

7 better in person, correct?

8 A. I can't speak to that, but yeah.

9 Q. Are you aware of any student who wanted to make that

10 transition from online to on-campus, but was unable

11 to do that because of the additional requirements of

12 the faith fit?

13 A. I am not aware, not any student specifically.

14 Q. Do you know, has Northwestern ever allowed a student

15 to take on-campus PSEO without agreeing to abide by

16 the declaration?

17 A. I am not aware, and I can provide some clarity to

18 that, my response.

19 Q. Sure.

20 A. For me to even see the application, for the

21 application to be considered complete, the

22 declaration needs to be signed, so it needs to be

23 acknowledged, reviewed and signed. So if it's not

24 signed, it doesn't go through the process for

25 completion. So I'm not aware of any student who

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1 wanted to be on campus and didn't sign the
 2 declaration because I would not have seen that
 3 application.
 4 Q. They just would not have passed it through as a
 5 completed application?
 6 A. That's correct, yes.
 7 Q. And fair to say that if a student refuses to sign
 8 the declaration, they don't get to take on-campus
 9 PSEO?
 10 A. I'm trying to -- I see this as the student's choice.
 11 With the declaration, what we ask is, Have you read
 12 the declaration? Do you agree to the declaration?
 13 So, again, I wouldn't -- I don't know and I can't
 14 track who has read it and not agreed to it because,
 15 again, I don't even see those files.
 16 Q. Are you aware of any instances where a student has
 17 applied and refused to sign?
 18 A. No.
 19 Q. Again, that would be something that you wouldn't
 20 necessarily have sightline to, correct?
 21 A. That's correct, yes.
 22 Q. Who would?
 23 A. We -- I mean, so as part of a -- how we track files,
 24 there are incomplete files, but most incomplete
 25 files generally fall into the category of student

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1 decided to go elsewhere, take PSEO somewhere else,
 2 or they didn't quite have time to complete the file
 3 to meet the deadline; but there isn't a way to track
 4 what's missing from the file when it's incomplete,
 5 it's just categorized as incomplete.
 6 Q. Okay. And for students whose applications are
 7 incomplete, is there any outreach from the
 8 University to see why, kind of what the hold-up is?
 9 A. Not to say why, but we encourage them, here is the
 10 deadline, let us know if you have any questions.
 11 Q. If you look at the last sentence, and it's not a
 12 full sentence because there's a quote from
 13 Galatians, I think, on the first page, it says, "We
 14 will put our relationship to Jesus Christ at the
 15 center of our lives and our studies." Do you see
 16 that?
 17 A. Yes.
 18 Q. And are PSEO students who attend courses on campus
 19 expected to put their relationship with Jesus Christ
 20 at the center of their lives and studies?
 21 A. Yes.
 22 Q. If you go to the next page, the last sentence of the
 23 first paragraph, it reads, "We understand that many
 24 rules and guidelines at University of Northwestern,
 25 instituted and followed by the whole community for

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1 the safety and benefit of all, were created to
 2 instruct and steer us into right choices, foster the
 3 Christ-centered community during our years here, and
 4 teach us how to spread Christ-centered community to
 5 others." Do you see that?
 6 A. Where are you reading again?
 7 Q. It's the last full sentence of this (indicating).
 8 A. Oh, okay. So "We agree ..., " here?
 9 Q. Here (indicating), if you could just read that. I
 10 think I read it correctly.
 11 A. Mm-hmm, I see it.
 12 Q. Okay. Are PSEO students expected to learn how to
 13 spread Christ-centered community to others?
 14 A. Yes. So PSEO on-campus students who have signed the
 15 declaration, any member of the Northwestern
 16 on-campus community who has signed the declaration,
 17 there is the expectation that what's written on the
 18 declaration should be met.
 19 Q. This same sentence references "safety." What does
 20 that word mean in this context?
 21 MR. BAXTER: Objection, outside the
 22 scope of the notice.
 23 But if you know, you can answer.
 24 THE WITNESS: My definition, and this
 25 is my own personal expression here, is the safety of

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1 other believers. So when I talk about some
 2 experiences that I have, I feel safe within the
 3 community of other believers. When I make
 4 references to scripture, I feel safe that they
 5 understand what I'm referring to. At least for me,
 6 that's what my personal interpretation is for
 7 "safety."
 8 BY MR. TIMMERMAN:
 9 Q. So providing safety for other students?
 10 A. Mm-hmm.
 11 Q. I'm sorry, that was a yes?
 12 A. I'm sorry, could you repeat that?
 13 Q. Yeah. It was just providing safety for other
 14 students is what I hear you saying?
 15 A. Well, individual safety and safety within the
 16 community of like-minded believers, yes.
 17 Q. Is there a concern that someone who doesn't believe
 18 in Jesus Christ might be a danger to the community?
 19 A. No, no concern.
 20 Q. Is there a concern that -- let me rephrase it.
 21 Have you ever heard the word
 22 "contamination" used in the context of ensuring that
 23 only believers of Jesus Christ are on campus
 24 together?
 25 A. No, I have not.

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1 Q. And if you go down to the last full paragraph on
 2 this page, the fourth sentence reads, "As followers
 3 of Christ, we turn from sexual immorality in its
 4 many forms ..." Do you see that?
 5 **A. I do, yes.**
 6 Q. Are same-sex relationships considered to be immoral
 7 under this declaration?
 8 **A. As defined by the declaration and as it's written**
 9 **there, yes.**
 10 Q. It is -- is a same-sex relationship considered to be
 11 a "sexual sin" under this policy?
 12 **MR. BAXTER:** Objection. If you're
 13 quoting, could you just point to where you're
 14 quoting?
 15 **BY MR. TIMMERMAN:**
 16 Q. The previous sentence says, "Believing that God
 17 redeems and restores through life in Christ, we walk
 18 alongside those that are seeking to overcome sexual
 19 sin." Do you see that?
 20 **A. I see that, yes.**
 21 Q. Is being gay a sexual sin at Northwestern?
 22 **MR. BAXTER:** Objection, vague.
 23 You can answer.
 24 **THE WITNESS:** No.
 25 **BY MR. TIMMERMAN:**

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1 Q. Is a man having a relationship with another man
 2 considered to be a sexual sin at Northwestern?
 3 **A. It would be considered sexual sin if the student has**
 4 **signed the declaration and still chose that**
 5 **behavior. It would be a sexual sin for me, as a**
 6 **married woman, if I have signed the declaration and**
 7 **I still choose to participate in extramarital**
 8 **affairs. So according to the declaration and**
 9 **according to the Bible and the principles of the**
 10 **declaration, yes.**
 11 Q. Okay. In this last sentence we just read, it also
 12 says that "... we walk alongside those that are
 13 seeking to overcome ..."
 14 Is there any effort at Northwestern to
 15 help students who are gay overcome being gay?
 16 **MR. BAXTER:** Objection, vague.
 17 You can answer if you know.
 18 **THE WITNESS:** My understanding is that
 19 students who have challenges in any of these forms
 20 where they feel as though they need the help,
 21 regardless of identity, would have that counseling
 22 if they so choose, and it's all by choice. Students
 23 are never forced, they are never coerced, it's all
 24 by their choice.
 25 **BY MR. TIMMERMAN:**

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1 Q. And in that same sentence again, it says, "... we
 2 walk alongside those that are seeking to overcome
 3 sexual sin."
 4 What about those that are not seeking
 5 to overcome sexual sin, for example a male PSEO
 6 student who is in a romantic relationship with
 7 another man? Does Northwestern walk alongside that
 8 student, as well?
 9 **A. So the "walk alongside" is those who have asked for**
 10 **help. If a student has not asked for help, as an**
 11 **institution, the institution would not know.**
 12 Q. Let's move on to the next paragraph if we could,
 13 starting with "We believe we are created by God ..."
 14 If you could just read that full paragraph, which
 15 continues on to page 3, I have some questions about
 16 that.
 17 **A. Okay.**
 18 Q. Have you had a chance to read that?
 19 **A. Mm-hmm.**
 20 Q. If you could turn to page 3, the second to last
 21 sentence in the declaration reads, "While we
 22 acknowledge there may be confusion and brokenness
 23 for some individuals in this area, we do not affirm
 24 or support transgender identity or expression."
 25 What does the declaration mean when it

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1 says "confusion and brokenness for some individuals
 2 in this area"?
 3 **A. I honestly cannot explain what's written on this**
 4 **declaration. I think it's -- it's very clear that**
 5 **the reference of "confusion and brokenness" would be**
 6 **any individual who feels as though they are -- they**
 7 **need help and those individuals, we will come**
 8 **alongside them.**
 9 Q. But this specific reference is in a paragraph that
 10 talks about individuals who are not cisgender,
 11 correct?
 12 **MR. BAXTER:** Objection, vague.
 13 **BY MR. TIMMERMAN:**
 14 Q. You know -- let me ask you this. Do you know what
 15 the term "cisgender" means?
 16 **A. I read about that. I believe cisgender is all --**
 17 **it's the umbrella that -- all-inclusive, yep.**
 18 Q. Okay. Cisgender actually means that your gender
 19 identity aligns with your biological sex.
 20 **A. I see.**
 21 Q. So let me ask the question a little bit different.
 22 Does Northwestern view transgender individuals as
 23 confused?
 24 **A. I do not -- I cannot answer that. I don't know.**
 25 Q. What about as broken?

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1 **A. I cannot answer that. I don't know.**
 2 Q. You don't know what the declaration means in this
 3 regard?
 4 **A. Oh, I understand what the declaration means, but the**
 5 **term "brokenness" has several interpretations.**
 6 **"Brokenness" could be I feel broken, I have had**
 7 **difficult experiences in my life, I need help.**
 8 Q. Okay. But I'm asking you, as the individual who has
 9 been identified to testify about this particular
 10 document on behalf of the University to explain what
 11 that sentence means in the declaration, "While we
 12 acknowledge there may be confusion and brokenness
 13 for some individuals in this area ..."
 14 **A. Mm-hmm.**
 15 Q. You would agree that "in this area" refers to gender
 16 identity, correct?
 17 **A. So I want to clarify that the term "brokenness," I**
 18 **don't believe that -- so this is a term that's used**
 19 **for somebody who needs help. It could be brokenness**
 20 **on the spiritual side, like I need help spiritually,**
 21 **and it's not just specific to what you're referring**
 22 **to. It could be an umbrella in any situation. It**
 23 **could be a student who is struggling with**
 24 **pornography, for instance, premarital sex. It could**
 25 **be a student who is struggling with addiction.**

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1 **I want to be clear that it's an**
 2 **umbrella, it's all-arching, it's not just**
 3 **specifically to students in the LGBTQ community.**
 4 Q. But according to this Declaration of Christian
 5 Community, does Northwestern believe that if you are
 6 transgender, you need something to be fixed?
 7 **MR. BAXTER:** Objection, asked and
 8 answered.
 9 **THE WITNESS:** I will say no.
 10 **BY MR. TIMMERMAN:**
 11 Q. Okay.
 12 **A. And I will go further in clarifying that, as**
 13 **students, it is not in our place to fix anyone. As**
 14 **a believer and as a Christian who follows the**
 15 **declaration, we trust in our relationship with**
 16 **Christ and that personal relationship is what leads**
 17 **us to redemption of any struggles that we have as**
 18 **individuals, but not a human being can fix any other**
 19 **human being. That's what I'm trying to explain and**
 20 **that's the understanding of our community, that we**
 21 **don't have the right or authority to fix any**
 22 **individual.**
 23 Q. That belongs to Christ?
 24 **A. Yes.**
 25 Q. Okay. Do you know of gay Christians?

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1 **A. I do, yes.**
 2 Q. Do you know any transgender Christians?
 3 **A. Mm-hmm.**
 4 **MR. BAXTER:** You need to answer yes or
 5 no.
 6 **THE WITNESS:** Oh, I'm sorry. Yes.
 7 **BY MR. TIMMERMAN:**
 8 Q. And do those individuals have a relationship with
 9 Christ?
 10 **MR. BAXTER:** Objection, calls for
 11 speculation.
 12 If you have personal knowledge, you can
 13 answer.
 14 **BY MR. TIMMERMAN:**
 15 Q. Yeah, to the extent of your knowledge, do those
 16 individuals have a personal relationship with
 17 Christ?
 18 **A. Yes.**
 19 Q. And the last sentence of this provision reads,
 20 "Instead, we place our faith and trust in God's
 21 redemptive plan."
 22 What does the phrase "redemptive plan"
 23 mean in this declaration?
 24 **A. So this statement, to my knowledge, does not refer**
 25 **to a physical plan, it's the redemptive plan of**

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1 **going through the walk of a believer where you**
 2 **recognize that you need Christ in your life and you**
 3 **accept Jesus Christ and you walk through that path**
 4 **to, eventually, perfection when we meet him one day,**
 5 **when we die and we meet him one day.**
 6 **So the redemptive plan is walking the**
 7 **life of a believer and trusting the Lord through our**
 8 **weaknesses to help us through that path. But I am**
 9 **not aware of an actual -- an actual physical**
 10 **redemptive plan.**
 11 Q. If you could, turn to the last page, please. I
 12 think we touched on this a little bit earlier, but I
 13 just want to go over it again. The second sentence
 14 of the second paragraph, here (indicating), "I will
 15 remember that I am, above all, an ambassador of
 16 Christ in His Kingdom." Correct?
 17 **A. Sorry, where did you say -- oh, yeah, "I will**
 18 **remember that I am, above all, an ambassador of**
 19 **Christ in His Kingdom," yes.**
 20 Q. And just to clarify, you expect PSEO students who
 21 take on-campus courses to be, above all, ambassadors
 22 of Christ in his kingdom, correct?
 23 **A. Yes.**
 24 Q. And if you violate this declaration, there are
 25 consequences, correct?

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1 **A. There are consequences, yes.**
 2 **Q. What are the consequences?**
 3 **A. The process would be -- so, again, just to separate**
 4 **a student's identity from a student's behavior,**
 5 **there are processes where the students -- a**
 6 **violation could be the behavior contradicts what the**
 7 **expectation is according to the declaration. It is**
 8 **always, always with grace and redemption. It is**
 9 **never to punish an individual, it is never to bring**
 10 **shame to an individual, but you read the term**
 11 **"coming alongside," so it's walking along with that**
 12 **individual to help them through the challenges that**
 13 **they are experiencing and to bring them back to**
 14 **focus, to follow the declaration. That's the**
 15 **consequence really.**
 16 **Q. And in terms of material consequences, can students**
 17 **be expelled for violating the Declaration of**
 18 **Christian Community?**
 19 **A. Ultimately, but I will tell you I have never seen**
 20 **that. I have never seen a student expelled for**
 21 **violating the Declaration of Christian Community.**
 22 **Q. Have you ever seen a student be suspended?**
 23 **A. The only suspension I am aware of is academic**
 24 **suspension. I have not seen, not to my knowledge, I**
 25 **haven't.**

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1 **Q. Are you aware of any material discipline that's come**
 2 **from a violation or resulted from a violation of**
 3 **this declaration?**
 4 **A. Could you give me an example of material discipline?**
 5 **Q. Yeah. So what I'm talking about, we talked about**
 6 **expulsion, we talked about suspension. Are there**
 7 **any other types of discipline that are handed out by**
 8 **the University short of expulsion or suspension;**
 9 **academic probation or probation of any type?**
 10 **A. Yeah, academic probation, that would be strictly on**
 11 **the academic side, so when the student doesn't meet**
 12 **their GPA minimum requirement. But as far as**
 13 **lifestyle behavior related to the declaration, not**
 14 **to my knowledge, I have not seen that.**
 15 **Q. Any type of probation that you've seen related to**
 16 **the nonacademic side of student behavior?**
 17 **A. I have not. So to emphasize on the redemptive**
 18 **position that Northwestern takes, it's a lot of**
 19 **partnering, embracing, loving, coming alongside the**
 20 **student, and it is where a student should never feel**
 21 **bullied, never feel like they are put to shame. If**
 22 **anything, the position is loving on that student. I**
 23 **have not seen a situation where there are material**
 24 **consequences because of a student's behavior as it**
 25 **relates to the declaration.**

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1 **Q. Have you ever seen a written warning of any type to**
 2 **a student saying that you violated the declaration**
 3 **and you need to take corrective action?**
 4 **A. Personally, I have not. If it exists, I have not**
 5 **seen it, yeah.**
 6 **Q. Did you speak with anyone other than your attorneys**
 7 **about whether that's ever occurred?**
 8 **A. My conversation with -- my conversation with the**
 9 **dean, because we did have a conversation, so this is**
 10 **the associate dean that I talked about, student**
 11 **life, Cory Wilder, because I had asked him to**
 12 **clarify for me what stance Northwestern takes and to**
 13 **affirm my assumptions and what I believed to be**
 14 **true, if a student was to violate the declaration,**
 15 **what position the institution takes.**
 16 **And Cory was very clear to say never**
 17 **punitive, it was always supportive and always cared**
 18 **for. In fact, he had -- he talked about these two**
 19 **branches of, you know, there's a violation of the --**
 20 **when you violate and you plagiarize, for example, or**
 21 **you -- you're not attending classes, skipping**
 22 **classes, so there's that violation, and then there's**
 23 **a violation of I'm struggling with pornographic**
 24 **thoughts or I stole my roommate's -- something,**
 25 **whatever, so there is that separate; but, again, he**

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1 **did emphasize that the identity is separate from the**
 2 **behavior and the consequences for the behavior is**
 3 **always a redemptive position from the institution,**
 4 **yeah.**
 5 **Q. Did you ask Cory specifically whether any students**
 6 **have ever been expelled or put on probation or**
 7 **suspended for violating the declaration?**
 8 **A. No, I did not.**
 9 **Q. Cory would be the person to talk to if we wanted**
 10 **more information on that, correct?**
 11 **A. He was -- I don't know if he's the one specifically,**
 12 **but he was the one I could reach when I had that**
 13 **specific question. The other individual, I'm not**
 14 **sure -- he had said he shared that responsibility**
 15 **with another member of Northwestern student**
 16 **lifestyle.**
 17 **Q. If you violate the declaration, is there any type of**
 18 **programming or courses or counseling that you're**
 19 **required to seek to come back into compliance?**
 20 **A. Every form of course direction, if I may use that**
 21 **term --**
 22 **Q. Yes.**
 23 **A. -- is all done through student life; and when I was**
 24 **seeking clarity, I didn't get any specifics on what**
 25 **the process was or the method, but the emphasis was**

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1 it was all done out of care and love.
 2 Q. So you don't know, for example, whether someone who
 3 violated the declaration was required to attend
 4 counseling?
 5 A. That I don't know.
 6 Q. Or required to attend programming?
 7 A. No. The only time that counseling was mentioned was
 8 if an individual -- so it could be a student, we've
 9 had staff who have needed -- they have reached out
 10 and said, look, I need counseling, and they have
 11 been referred to the counseling service; never
 12 coerced, it's always voluntary to say, okay, here is
 13 the office, contact the director and he will assign
 14 you to a professional counselor.
 15 But from what I -- Cory was very clear,
 16 this was never suggested to a student or to a
 17 faculty or a staff member.
 18 Q. Okay. You've mentioned a couple times this concept
 19 of identity versus conduct.
 20 A. Mm-hmm.
 21 Q. Would you agree that part of the identity of being
 22 gay is being attracted to people who are your same
 23 sex?
 24 A. By definition, yes.
 25 Q. And would part of the identity of being gay be

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1 wanting to pursue relationships with people of the
 2 same sex?
 3 MR. BAXTER: Objection, calls for
 4 speculation.
 5 THE WITNESS: Not always.
 6 BY MR. TIMMERMAN:
 7 Q. Sometimes?
 8 A. Yeah, I -- sometimes, yes.
 9 Q. Do you consider being married as a part of your
 10 identity?
 11 A. One of, yes.
 12 Q. Are the consequences for violating the Declaration
 13 of Christian Community the same regardless of
 14 whether you're a PSEO student or an undergraduate
 15 student taking on-campus courses?
 16 A. The consequences are the same for every member of
 17 the campus community who have signed the
 18 declaration.
 19 Q. Okay, thank you. Are students encouraged to report
 20 if they suspect a peer is violating the declaration?
 21 A. No.
 22 Q. Do students make reports about suspected violation?
 23 A. It is not a practice. It is not a practice for
 24 students to report if they suspect a violation.
 25 There are students who have been put in some

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1 positions, for example students who serve as
 2 resident assistants, who it is part of their
 3 responsibility to work with students in those
 4 residential dorms and there is a process that helps
 5 them along the way, but besides that, I don't know
 6 of any student who tells on another student.
 7 Q. Okay. So are you aware of reports that have been
 8 made by RAs who are overseeing residence halls?
 9 A. I am not aware, no.
 10 Q. But there is an understanding that -- I mean, I
 11 think that's common for all RAs, right --
 12 A. Yes.
 13 Q. -- if somebody is violating conduct?
 14 A. Yes.
 15 Q. Okay. Are you aware of a report ever being made
 16 about a student who was engaging in a same-sex
 17 relationship?
 18 A. No.
 19 Q. Any discipline a student has received for being in a
 20 same-sex relationship?
 21 A. No, I'm not aware.
 22 Q. Again, Cory would be the person who would know that
 23 firsthand, correct?
 24 A. Cory might be able to answer, but if he can't answer
 25 that question, he'll refer you to the person who

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1 will be able to answer that.
 2 Q. Are you aware of any students being reported for
 3 discipline for dressing in a manner that is contrary
 4 to their biological sex?
 5 A. No.
 6 Q. Are you aware of any reports or discipline for
 7 students being nonChristian or expressing faith in a
 8 different religion?
 9 A. Reported, no, I am not aware.
 10 Q. Any discipline?
 11 A. No.
 12 Q. Has anyone ever been expelled or suspended for that?
 13 A. No.
 14 Q. Why is it important to Northwestern that same sex
 15 students not have relationships as defined by your
 16 declaration?
 17 A. Well, going back to the building blocks of the
 18 institution, everything that we do, our lifestyle,
 19 what we confess in our ethos is centered around the
 20 love of Christ, and in our weakness we try to
 21 practice that. We try to practice what's written in
 22 the declaration. So that's why it's important to
 23 the institution. It's the foundation of what
 24 Northwestern is about. It's a Christ-centered
 25 community, biblically-based, and everything we do is

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1 **centered around that as an institution.**
 2 Q. Is it because the Bible says that same-sex
 3 relationships are wrong?
 4 **A. I don't believe the Bible explicitly says it in that**
 5 **word, but we have to follow what the Bible says**
 6 **because, again, Northwestern is based on biblical**
 7 **principles.**
 8 Q. I believe that -- it's been a while since I've read
 9 this, but the Bible says something to the effect of
 10 a man shall not lay with another man, correct?
 11 **MR. BAXTER:** Objection, I believe
 12 that's outside the scope.
 13 But if you know, you can answer.
 14 **THE WITNESS:** I don't know the
 15 reference. It sounds familiar, but I would love to
 16 see the scripture related to that, yes.
 17 **BY MR. TIMMERMAN:**
 18 Q. Have you ever reviewed that scripture?
 19 **A. I have, yes.**
 20 Q. In what context?
 21 **A. Through my faith journey. I've been a Christian for**
 22 **a long time. I have seen it at one point. I can't**
 23 **remember the exact -- how long ago it was, but I**
 24 **have seen it, yeah.**
 25 Q. So would you say that the doctrinal foundation for

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1 Northwestern is literalism? Do you understand what
 2 that means, that what the Bible says is literally
 3 true and inerrant?
 4 **A. It is inerrant, yes. We follow the instructions of**
 5 **the Bible and what the Bible says, yes.**
 6 Q. All of the instructions?
 7 **A. Well, there's some that's not applicable to -- for**
 8 **example, we don't sacrifice goats and sheep anymore.**
 9 Q. What about tattoos? Like, I know the Bible
 10 prohibits the marking of skin. Does Northwestern
 11 allow students who have tattoos to attend on-campus
 12 classes?
 13 **A. Students who have tattoos are part of the**
 14 **Northwestern community, yes.**
 15 Q. I know the Bible also prohibits wearing clothing
 16 made from more than one type of cloth. Are there
 17 students on campus at Northwestern who wear more
 18 than one kind of cloth on a daily basis?
 19 **MR. BAXTER:** Objection, lack of
 20 foundation.
 21 You can answer if you know.
 22 **THE WITNESS:** Literally, yes, you can
 23 wear silk and cotton in the same fabric.
 24 **BY MR. TIMMERMAN:**
 25 Q. Okay. Do you know of any students who have

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1 voluntarily unenrolled from Northwestern because of
 2 their religious beliefs?
 3 **A. I don't know of any student. I personally do not**
 4 **know of any student.**
 5 Q. Would you be the person who would know about
 6 students who had unenrolled?
 7 **A. No.**
 8 Q. Who would?
 9 **A. So I work with students from the point of inquiry to**
 10 **when they enroll, when they finally join the**
 11 **community, but beyond that, we have another team**
 12 **that works with retention and beyond. So I don't**
 13 **work with that.**
 14 Q. To the best of your knowledge, who on the team is
 15 the person with the most knowledge of student
 16 voluntary unenrollment?
 17 **A. I would start with -- I mean, if you are looking at**
 18 **the University, the provost would be the person,**
 19 **Janet Sommers.**
 20 Q. So fair to say that you don't know reasons why any
 21 student would have unenrolled?
 22 **A. It's -- those conversations or occurrences are kept**
 23 **confidential for the integrity of the student and**
 24 **institution, so it would not be a practice for me to**
 25 **know.**

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1 Q. Okay. So you wouldn't know, for example, if a
 2 student has voluntarily unenrolled because of their
 3 sexual orientation?
 4 **A. No.**
 5 Q. Or because of their gender identity?
 6 **A. I would not know that.**
 7 Q. Or because they are pregnant?
 8 **A. I would not know that.**
 9 Q. What is Northwestern's position with respect to
 10 students who are pregnant?
 11 **A. Care and love, yeah. I'm trying to think if I have**
 12 **seen a situation, pregnant students; yeah, married,**
 13 **out of wedlock, it's always been care and love, not**
 14 **expulsion.**
 15 Q. Okay. Are you aware of any students who have
 16 voluntarily unenrolled because they claim to have
 17 experienced some type of discrimination?
 18 **A. No.**
 19 Q. Are you aware of any reports to the institution
 20 about discrimination on the basis of sexual
 21 orientation?
 22 **A. No.**
 23 Q. Would that be within your purview or is that, again,
 24 someone else?
 25 **A. I am not aware of a situation in that manner. The**

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1 provost could tell you, but again, if there is any
 2 situation in that light, it would be confidential.
 3 Q. Are you aware of any inquiries or complaints that
 4 Northwestern has received about the Declaration of
 5 Christian Community specifically from PSEO students
 6 on campus?
 7 A. Yes.
 8 Q. What do you know?
 9 A. There was a document provided to me as part of the
 10 preparation for the deposition and I did see a
 11 couple of instances where students expressed concern
 12 that they were denied admission because they did not
 13 meet -- denied admission for on-campus.
 14 Then there is another instance where a
 15 student, while they were completing the application,
 16 they came across some questions that were related to
 17 their faith in Jesus Christ and they didn't
 18 understand what that was because they were not
 19 Christians.
 20 So, yes, I have seen -- I have seen
 21 those instances and I'm aware of them.
 22 Q. And do you know whether those individuals were
 23 allowed to progress in the application process?
 24 A. Well, I mean, for students -- I had explained
 25 earlier, for the application to be complete, you do

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1 have to sign the declaration. So there are
 2 students -- based on the evidence that I looked at,
 3 it appeared as though they were students who came
 4 across those statements or those requirements and
 5 then pulled back and did not complete the file.
 6 Q. So the inquiries and complaints that you're aware of
 7 are based on documents that you've reviewed?
 8 A. Yes.
 9 Q. Have you spoken with anyone other than your
 10 attorneys within the institution?
 11 A. About that, no.
 12 Q. Who would be the person who would know what
 13 complaints and inquiries the school has received
 14 about the faith statement or the faith requirement
 15 for PSEO students and their families?
 16 A. So I would have some knowledge. I'm aware of those
 17 instances and if there is ever a complaint about a
 18 student struggling with completing an application,
 19 and there have been instances where we get a call
 20 from a family member or an email from a student. So
 21 I do have -- I do have knowledge in some of those
 22 cases.
 23 Q. But you're not specifically in the PSEO realm,
 24 correct?
 25 A. So going back to when I was leading that, the

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1 admissions for that, yeah, I have knowledge of some
 2 of those instances.
 3 Q. Okay.
 4 A. For now, the person who oversees PSEO admissions
 5 reports to me directly, so that would be Tami
 6 Treder.
 7 Q. Oh, that's right. Beyond the documentation that
 8 you've reviewed in preparation for today, are there
 9 any other inquiries or complaints that you can
 10 recall being made aware of when you were in that
 11 role?
 12 A. Mm-hmm, yeah. Yeah.
 13 Q. Can you tell me about those?
 14 A. Yeah. There was one in particular where the student
 15 had checked that they -- so the question is -- there
 16 are two check boxes, two boxes that you have to
 17 check. So there's one that says you believe that
 18 the Bible is the final authority and informs all
 19 matters of conduct and behavior in our faith, and
 20 then the other one, that you have accepted Jesus
 21 Christ as Lord and Savior of your life.
 22 So there were a couple instances that I
 23 have seen where the student did not check the Bible
 24 as the final authority and did not check the box as
 25 though they were believers, but then signed the

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1 Declaration of Christian Community. So the file was
 2 completed, it came to our office, and what -- for
 3 the file to be fully complete, we need to make sure
 4 that the student understands what all of those
 5 questions are and what they related to.
 6 The step normally in that case is the
 7 admission counselor will follow up with the student.
 8 So there was -- with the student there was a phone
 9 call or an email, I can't remember, where the
 10 student -- there was conversation with the admission
 11 counselor, and I'm recounting what the admission
 12 counselor told me, that this one particular student
 13 was -- he -- this individual said they were willing
 14 to abide by the declaration, but they are not
 15 believers. What we talked about was do you have an
 16 understanding or clarity of what it means to have
 17 Jesus Christ as Lord and Savior of your life; and
 18 the student said, I do, but I do not want to check
 19 that box.
 20 As we talked more about the
 21 declaration, the student voluntarily pulled back and
 22 said, I don't think I want to be part of your
 23 community because I probably will not be able to
 24 abide by those rules. So there was that situation.
 25 Q. Okay.

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1 A. And that was -- it was a while ago, if I remember,
 2 but our position was we wanted to encourage the
 3 student to go ahead and still apply. We took the
 4 position to explain what they had signed, that they
 5 understood it. The student decided that they would
 6 not pursue the application and made the option to
 7 take their classes online instead.
 8 Q. Okay.
 9 A. And the student actually voluntarily said that the
 10 online option would probably be a better fit for him
 11 anyway because of his work schedule and his class
 12 schedule, high school class schedule. So that is
 13 one situation in particular that I can recall.
 14 Q. And if the student had persisted and not signed
 15 those boxes, but did sign the declaration, would
 16 that student be allowed to attend on-campus PSEO?
 17 A. Well, again, for the file to be complete, those
 18 checks -- we want to make sure, we absolutely want
 19 to make sure that the student understands what the
 20 community is, the Northwestern community that they
 21 are planning to participate in. So that's why we
 22 usually make that extra step to follow up with the
 23 student.
 24 Q. So those boxes have to be checked for the
 25 application to be considered complete?

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1 A. That's correct.
 2 Q. Okay. I don't see -- if you look back to this
 3 exhibit, I don't see any boxes on this declaration.
 4 I certainly see the signature line and date line on
 5 the last page.
 6 A. Mm-hmm.
 7 Q. Is there a different version of this document that
 8 has boxes to check?
 9 A. So there is -- on the application, so if you go to
 10 the online portal, there are questions, required
 11 questions that the students have to respond to if
 12 they are choosing to attend the on-campus option and
 13 that's a part of the requirement. There is an
 14 electronic version of this where the student clicks
 15 on the link and then it opens up a PDF version of
 16 the declaration that they then come back and say I
 17 have read and I'm signing it. So the signing is --
 18 I think there is a version where you just type in
 19 your name and it submits the application.
 20 Q. That makes total sense. I figured there might be
 21 automation that was involved.
 22 A. Yeah, it's all automated.
 23 MR. BAXTER: It's been about another
 24 hour.
 25 MR. TIMMERMAN: It has been another

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1 hour. Should we take -- how long would you like for
 2 lunch?
 3 (Lunch break taken from 12:08 to 1:03.)
 4 BY MR. TIMMERMAN:
 5 Q. Ms. Cline-Cole, I'm not going to pick up directly
 6 where we left off, but kind of relatedly, if
 7 Northwestern learned that a student on campus was
 8 gay, what would the response be?
 9 A. So if Northwestern learned that a student on campus
 10 was gay, it depends on how that information -- how
 11 Northwestern learned about that. Most times the
 12 institution doesn't do anything unless the student
 13 comes forward.
 14 If the student approaches Northwestern,
 15 meaning the administration, specifically student
 16 life, there's a conversation that happens and then
 17 it's usually centered around, okay, next steps,
 18 where the student would either say, yeah, I want to
 19 continue staying in this community, I want to follow
 20 what's written in the declaration; and it's always,
 21 again, that position of what can we do, you know,
 22 with this and how do we come alongside you.
 23 Q. Sure.
 24 A. In most cases that's what my understanding is, and
 25 this has been mostly for traditional students. I

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1 have not heard of specifically PSEO on-campus
 2 students. So with traditional students, they
 3 continue living within the community and the
 4 institution works with them. I don't --
 5 Q. What would happen if the student said, hey, I'm gay,
 6 that's who I am? Would they be allowed to continue
 7 on at the college?
 8 A. Well, with the declaration, you know, one of the --
 9 it's very important that if you're part of the
 10 community, you want to live the life that
 11 exemplifies Christ, as stated in the covenant. So
 12 if somebody willingly says, I don't want to choose
 13 that option, I don't want to live that life -- they
 14 signed the covenant. It's kind of like if a student
 15 is admitted to an institution and there are some
 16 rules and regulations that they have to follow, like
 17 in the handbook, for example. If a student decides
 18 that I don't want to choose this, they are given the
 19 option.
 20 I will say, though, I have not heard of
 21 an expulsion, but when I look at how the process is
 22 laid out, ultimately, ultimately, there will be
 23 expulsion, but expulsion is not a mean thing to say
 24 we're kicking you out. This is where there's an
 25 agreement that the student has decided that I don't

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1 want to be part of this community, I don't want to
2 behaviorally follow the directives of the Christian
3 community and then they make that choice to leave.
4 Again, I have not heard of a situation
5 like that in our PSEO program on campus, and just
6 speaking from the traditional side, I have also not
7 seen a situation like that.
8 (Northwestern Deposition Exhibit 3 was
9 marked for identification by the court
10 reporter and attached hereto.)
11 BY MR. TIMMERMAN:
12 Q. This is Exhibit 3, Ms. Cline-Cole. Please take a
13 moment and read it.
14 A. Okay.
15 Q. Have you had a chance to read it?
16 A. Yes.
17 Q. Okay. So I'll represent to you that -- I mean, the
18 subject of this email is "Beatrice," and I'll
19 represent to you that Beatrice is someone who
20 testified in favor of the PSEO law at the
21 legislature and expressly stated that she was a
22 lesbian and couldn't have gone to Northwestern for
23 PSEO.
24 Do you agree with what Mr. Johnson says
25 here, or Dr. Johnson says here, that if she got on

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1 campus as a student and her chosen lifestyle was
2 revealed, she likely would have requested a meeting
3 with her, approached the topic and, if she was
4 persistent on living out this lifestyle throughout
5 her student experience, would have asked her to
6 leave?
7 A. I agree, but I think what is missing here is
8 compassion.
9 Q. Okay.
10 A. Unfortunately, that's not stated in Mr. Johnson's --
11 Dr. Johnson's email response. There is compassion
12 throughout this process, you know, kind of like I
13 highlighted. I think if a student persists that I
14 want to live a separate lifestyle different from the
15 covenant -- and the covenant, I have to emphasize,
16 it's critical. It's centered around what we do at
17 Northwestern as an institution.
18 So if an individual chooses not to
19 follow the lifestyle of the covenant that they have
20 signed, then the next step would be, obviously,
21 there would be conversations, there would be some
22 intervention, okay, let's talk about this, why not,
23 but if there is persistence, very similar to what
24 Dr. Johnson has written here, it is true, it is
25 expulsion.

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1 Now, I -- again, I will emphasize I am
2 not familiar with a case where a PSEO student has
3 been expelled from our on-campus program in any way.
4 So I'm reading this Exhibit 3. It was also part of
5 what was provided to me and I cannot recall this
6 occurrence or somebody who has experienced this on
7 campus.
8 Q. Do you have any idea what Dr. Johnson means with
9 "persistent in living out this lifestyle?" What
10 does that mean?
11 A. So if I read this correctly, it would be in the
12 context of the student -- the term that's used here,
13 being "lesbian." So that's the persistent on living
14 out this lifestyle throughout the student
15 experience, which for me, how I see this is as --
16 does it align or not align to the declaration that
17 the student signed? Again, I cannot confirm any of
18 this.
19 Q. Sure.
20 A. But that's what I interpret Dr. Johnson saying from
21 this letter.
22 Q. I mean, I -- correct me if I'm wrong, but I
23 interpret this to mean that if you are gay and you
24 attend on campus, you have to be closeted. Is that
25 fair?

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1 MR. BAXTER: Objection --
2 BY MR. TIMMERMAN:
3 Q. Do you know what the word "closeted" means?
4 A. I have an understanding of what the word means, yes.
5 Q. Is it the expectation of Northwestern that gay
6 students should be closeted?
7 A. I will say no. I -- again, my understanding is it's
8 never presented that way. I don't believe that we
9 will force a student to be unhappy or to live a
10 lifestyle that they choose not to live. There is
11 always an understanding, there is always compassion,
12 there is always conversation, there is always an
13 agreement, but I don't believe that a student will
14 be forced to live a closeted lifestyle.
15 Q. Would you agree that that's what Dr. Johnson's email
16 suggests?
17 A. I don't see him using the word "closeted" here,
18 unfortunately. So "persistent on living out this
19 lifestyle," this is not somebody who is closeted to
20 me.
21 Q. So how can one not live out this lifestyle?
22 MR. BAXTER: Objection, vague.
23 THE WITNESS: I can't answer that.
24 BY MR. TIMMERMAN:
25 Q. And Dr. Johnson concludes by saying, "This is the

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1 same approach that's taken with our current
2 traditional undergraduate students." Do you see
3 that?
4 **A. I see that, yes.**
5 Q. Any reason for disputing that this same rule applies
6 to PSEO students that applies to undergraduate
7 students?
8 **A. The emphasis here is on behavior, behavior that**
9 **contradicts the Declaration of Christian Community,**
10 **so any behavior that contradicts the declaration and**
11 **the individual chooses to continue living the**
12 **lifestyle that is contradicting to the declaration**
13 **that that individual had signed and agreed upon,**
14 **which is the unified document that we all follow as**
15 **a community at Northwestern, then yes, that's that**
16 **individual's choice and they will not feel part of**
17 **the community. If anything, I think it would be a**
18 **challenge for them if they are choosing a different**
19 **lifestyle than is different from what the**
20 **declaration has stated.**
21 Q. And the lifestyle in this example is being gay?
22 **MR. BAXTER: Objection.**
23 **BY MR. TIMMERMAN:**
24 Q. Correct?
25 **A. We looked at the declaration and it would be**

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1 **practices that's -- that are on here; and I would**
2 **prefer to use the terminology that's listed on the**
3 **declaration. So it could be any of those that's**
4 **listed on here.**
5 Q. Okay. Well, we're referencing a cabinet member's
6 email, though, so that's what I'm asking about.
7 **A. Right.**
8 Q. Do you have any understanding of what the word
9 "lifestyle" means as he's used it here?
10 **A. I cannot speak to what was Dr. Johnson's thought**
11 **process at the time and what he was thinking.**
12 **Dr. Johnson is the chief of staff. I think that**
13 **perhaps, if this was a letter from a provost, for**
14 **instance, that would have been something I would**
15 **lean more into, but again, I don't know what his**
16 **thought process was at the time and I cannot speak**
17 **to that and the use of the term and how he chose his**
18 **words.**
19 Q. He also references a "chosen lifestyle." Do you see
20 that in that same paragraph?
21 **A. Can you tell me where --**
22 Q. Sure (indicating).
23 **A. Sure, yes.**
24 Q. Is it Northwestern's view that being gay is a chosen
25 lifestyle?

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1 **A. I -- I can't speak to that. So Northwestern, if I**
2 **look at Northwestern and what the institution is, an**
3 **institution of grace, love, kindness, compassion,**
4 **anything that makes a student feel not part of or**
5 **not welcomed or not loved or not cared for,**
6 **Northwestern is not part of that. So if there's**
7 **anything here that's condemning, Northwestern will**
8 **not be a part of that.**
9 **So, again, I don't know why Dr. Johnson**
10 **chose the words that he did, but I would not say**
11 **that this is reflective of the institution or the**
12 **declaration.**
13 Q. This is an email to a state senator, though,
14 correct?
15 **A. Mm-hmm. I see that, yes. I see that.**
16 Q. Is it your personal belief that being gay is a
17 choice?
18 **A. I don't see that being relevant.**
19 Q. Okay.
20 **A. I would prefer to keep my personal opinions to**
21 **myself.**
22 Q. Okay, but you have to answer my question,
23 unfortunately, unless there is an objection and
24 instruction not to.
25 **MR. BAXTER: I will object as outside**

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1 the scope.
2 If you want to answer -- if you have a
3 personal opinion about it, you can answer the
4 question.
5 **THE WITNESS: My personal opinion is**
6 **that we were all created in God's image and likeness**
7 **and God loves us for who we are.**
8 **BY MR. TIMMERMAN:**
9 Q. Okay, but that wasn't my question. My question was,
10 is it your personal opinion, subject to your
11 counsel's objections, that being gay is a choice?
12 **MR. BAXTER: Objection, vague.**
13 **THE WITNESS: I don't have an opinion**
14 **on that.**
15 **BY MR. TIMMERMAN:**
16 Q. Do you have an opinion about whether being
17 transgender is a choice?
18 **A. No.**
19 **MR. BAXTER: Objection, also vague.**
20 **BY MR. TIMMERMAN:**
21 Q. No opinion? Does anyone at Northwestern have an
22 opinion about whether being gay is a choice?
23 **MR. TIMMERMAN: Objection, outside the**
24 **scope.**
25 **THE WITNESS: I have not had this**

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1 conversation with anyone at Northwestern so, no, I
 2 don't know.
 3 **BY MR. TIMMERMAN:**
 4 Q. Are you aware of any instances where a student has
 5 reported discrimination or harassment based on their
 6 sexual orientation?
 7 A. No, I'm not aware of that.
 8 Q. Would you be aware of those in the course of your
 9 duties?
 10 A. No.
 11 Q. Who would know that?
 12 A. That would be -- if you're referencing traditional
 13 students, that would be student life, so Cory might,
 14 but again, Cory shares that responsibility with
 15 another individual and he -- I can follow up to find
 16 out who that person would be. If you're referencing
 17 any student outside of the traditional core, it
 18 would be Heidi Hoefs. Heidi Hoefs would know.
 19 Q. Suffice to say you don't know if any PSEO students
 20 have complained about discrimination, correct?
 21 A. Yeah, that's correct.
 22 Q. And you don't know whether there's been any
 23 investigation of sexual orientation discrimination
 24 involving a PSEO student, correct?
 25 A. That's correct, I don't know.

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1 Q. Would you agree that the Declaration of Christian
 2 Community treats heterosexual and same-sex
 3 relationships differently?
 4 **MR. BAXTER:** Objection, vague.
 5 You can answer if you know.
 6 **THE WITNESS:** Going back to the
 7 statements on the declaration, and there was one
 8 that you pointed out to me, so I would prefer to
 9 read that directly from here. Where it says, "We
 10 believe --" so this is the last sentence on page 2.
 11 "We believe we are created by God in his image as
 12 two distinct sexes, male and female," and the
 13 scripture -- Northwest didn't create this on their
 14 own, there's a scripture reference for that. And we
 15 believe that each person glorifies God and affirms
 16 his infinite holiness and wisdom.
 17 **BY MR. TIMMERMAN:**
 18 Q. That's fair. Just suffice to say that the school's
 19 position is set forth in the declaration?
 20 A. It is set forth in the declaration and, again, as a
 21 member of the community, we encourage students,
 22 faculty, staff, even before you sign the
 23 declaration, that you know what you're signing. We
 24 don't make the rules. This is all biblically based,
 25 we didn't write it, and it's part of the foundation

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1 of the institution. It is my responsibility as a
 2 staff member and also my responsibility when I was a
 3 student to follow what was written in the
 4 declaration.
 5 Q. Okay. Do you have any knowledge about Title IX
 6 complaints?
 7 A. I only have knowledge based on some of the documents
 8 that were provided to me in preparation for the
 9 deposition.
 10 Q. Did you speak with anyone about Title IX complaints
 11 other than your lawyers?
 12 A. No.
 13 Q. Who is responsible for the Title IX office?
 14 A. So the staff position is housed in human resources.
 15 The individual that was cited in those complaints,
 16 Kelly Frank (phonetic), is no longer at the
 17 institution. We have a new Title IX officer. Her
 18 name is Megan B. I don't know how to pronounce the
 19 last name, but she is the only Megan B.
 20 Q. The only Megan B in HR?
 21 A. The only Megan B in HR, yes.
 22 Q. Okay, that's fair.
 23 (Northwestern Deposition Exhibit 4 was
 24 marked for identification by the court
 25 reporter and attached hereto.)

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1 **BY MR. TIMMERMAN:**
 2 Q. Ms. Cline-Cole, this is Exhibit 4, and I'll
 3 represent to you that this is just a print-off from
 4 the Northwestern website.
 5 A. Mm-hmm.
 6 Q. Take a minute -- feel free to take a minute to
 7 review it.
 8 **MR. BAXTER:** I'll just note an
 9 objection that the document hasn't been
 10 authenticated or produced, but we'll accept your
 11 representation for purposes of the questions.
 12 Take your time to read the document and
 13 be familiar with it.
 14 **BY MR. TIMMERMAN:**
 15 Q. Please, and apologies for the very large print, but
 16 I couldn't get it to print smaller.
 17 Have you had a chance to review it?
 18 A. Yes. Yes, I just did.
 19 Q. Okay. My first question for you is, does
 20 Northwestern have the same philosophy of education
 21 for on-campus PSEO students as it does for
 22 traditional undergrad students?
 23 A. Yes.
 24 Q. And I'm just reading excerpts from this document.
 25 Are PSEO courses grounded, first and foremost, in

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1 the truth of the Bible and in God as the ultimate
 2 reality of the universe?
 3 **MR. BAXTER:** Objection, vague.
 4 You can answer.
 5 **THE WITNESS:** So PSEO courses like --
 6 for on-campus PSEO courses, they share the same
 7 catalog as our traditional courses, and all of those
 8 courses are taught from a biblical worldview.
 9 However, the content and how a
 10 student's work is assessed is different. So for a
 11 student on campus to be able to register for a
 12 course -- so each of those courses have attributes
 13 to them. An on-campus PSEO student is only able to
 14 register for a course that has been vetted, that has
 15 gone through the auditing process. We have an
 16 auditing body. So the acronym is APCC and I'm not
 17 familiar -- I can't recall exactly what it stands
 18 for, but it's APCC.
 19 So APCC thoroughly audits PSEO-eligible
 20 courses twice a year to make sure that it meets the
 21 definition of the Minnesota Department of Education
 22 of what is sectarian and nonsectarian. So even
 23 though these courses are taught by faculty members
 24 who have signed the declaration, who are Christians,
 25 either adjunct or full-time, even though it may be

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1 taught from a biblical worldview, these courses are
 2 nonsectarian. They don't have a religious component
 3 where a student's grade would be assessed based on
 4 their religious views or their beliefs.
 5 So that would be an explanation, I
 6 think, as I read the philosophy of education, that
 7 every course that is taught at Northwestern would be
 8 taught from a biblical worldview.
 9 Q. Are PSEO students expected to be enthusiastic
 10 witnesses of God's truth?
 11 **A. PSEO students --**
 12 Q. On campus.
 13 **A. -- on campus, yes, who have signed a declaration who**
 14 **have professed Christ and have checked the boxes**
 15 **that, yes, they are Christians and, yes, they are --**
 16 **they believe in the Bible, they are not expected to**
 17 **exemplify that as a way to measure their grades or**
 18 **to earn their grades; however, lifestyle-wise, that**
 19 **is a common expectation just because they are on**
 20 **campus.**
 21 Q. So for traditional undergraduate students, are they
 22 measured on their ability to fulfill the educational
 23 philosophy goals?
 24 **A. Yes, there are some -- so there is this -- we talked**
 25 **about it earlier. So this is the spiritual**

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1 **development credit, so part of that is students have**
 2 **to attend chapel and they have to participate in**
 3 **community service. So that's -- that's almost like**
 4 **when, at any other institution, when a student does,**
 5 **like, an externship and an internship.**
 6 Q. Sure.
 7 **A. So part of that is community service. Community**
 8 **service is going out and exemplifying Christ and**
 9 **serving your community. So that is one way that is**
 10 **measured, so chapel attendance, spiritual**
 11 **development -- spiritual development credit, and**
 12 **then community service for on-campus traditional**
 13 **students.**
 14 Q. This document also says that the study of the Bible
 15 is central in our approach to education. Is that
 16 also true for on-campus PSEO students?
 17 **A. No, that's not true. So for traditional students,**
 18 **every traditional student is required, in order to**
 19 **complete their degree, to earn 30 credits of**
 20 **Bible -- Bible credits. So those would fall under,**
 21 **you know, theological studies.**
 22 **Now, for PSEO students on campus, they**
 23 **are not allowed to take any of those Bible classes.**
 24 **If a PSEO student wants to register for a Bible**
 25 **class, they would have to register for that through**

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1 **early college sort of school and they would have to**
 2 **pay in order to take those classes. So there is a**
 3 **fee that's attached to it.**
 4 Q. What about those eight students, PSEO students who
 5 live on campus, do they --
 6 **A. No, never. Every PSEO student, in order to complete**
 7 **your PSEO program through Northwestern, you are only**
 8 **allowed to take and you only have access to the**
 9 **nonsectarian courses.**
 10 Q. Are PSEO students trained to be witnesses of God's
 11 redemptive glory?
 12 **A. No.**
 13 Q. If you turn to -- and I apologize, the page numbers
 14 are small and in the right-hand corner, but 4 of 8.
 15 You would agree, based on what we've talked about
 16 today, that Northwestern requires that on-campus
 17 PSEO students must profess their faith in Jesus
 18 Christ as their Lord and Savior, correct?
 19 **A. That's correct, yes.**
 20 Q. Why is that important to Northwestern?
 21 **A. It's the community that -- as a member of the**
 22 **Northwestern community, again, it's the expectation.**
 23 **The purpose of that community is to develop**
 24 **Bible-believing individuals who have professed Jesus**
 25 **Christ as their Lord and Savior to develop them**

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1 spiritually and academically so that they will go
 2 out into the world and be witnesses for Christ.
 3 That is the premise of the community. It's
 4 development, it's growth, it's nurturing and,
 5 really, that is being led by and motivated by the
 6 love for Jesus Christ.
 7 Q. And the purpose of requiring PSEO on-campus students
 8 to sign and to agree to this is to ensure that that
 9 community remains intact; is that right?
 10 A. Well, I wouldn't say intact, but it's so that
 11 students who choose not to participate will not
 12 feel -- will not feel -- what's the word now? Not
 13 neglected, but like they don't belong, I think
 14 that's the term, because there's an understanding
 15 that that's what we're about. If there's a student
 16 who thinks that, oh, this is strange for me, this
 17 is -- I don't want to be part of this, they will
 18 feel left out. I think that's -- that would be the
 19 premise of the community, where it's for growth,
 20 it's for spiritual development, essentially, so.
 21 Q. You've mentioned ethos today a couple of times in
 22 terms of the ethos of the university. What do you
 23 mean by that term?
 24 A. I talk about the Christian values fundamentally, you
 25 know, the heartbeat of the institution, how it was

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1 founded and the purpose, why it was founded and the
 2 people who founded the institution. So I look at
 3 all of that, that full umbrella of it, the heartbeat
 4 of the institution.
 5 Q. And would allowing nonChristian students to take
 6 PSEO courses on campus impact that ethos?
 7 A. I think it's more where the student feels like they
 8 are a part of that community. If a nonbeliever
 9 joins that community, the expectation is that you
 10 have read and, if you sign it, you're professing
 11 that you are a believer and you understand the ethos
 12 of the community.
 13 Q. But I'm saying if the PSEO law is upheld in this
 14 case and that statement is no longer required, would
 15 allowing nonChristian PSEO high school kids --
 16 A. Right.
 17 Q. -- to come on campus to take courses at Northwestern
 18 impact the ethos of Northwestern's campus?
 19 MR. BAXTER: Objection, calls for
 20 speculation, outside the scope.
 21 If you have an opinion, you can offer
 22 it.
 23 BY MR. TIMMERMAN:
 24 Q. Is it Northwestern's position that that would impact
 25 the ethos of its campus?

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1 A. So I will say the position of Northwestern and the
 2 position of the board and the cabinet, especially
 3 the board of trustees who we would refer to as like
 4 our governing board, have come to the decision that
 5 every member of the community, in order to be part
 6 of the community, you have to sign the statement of
 7 faith.
 8 So it's noncompromising and there are
 9 two commitments that are absolutely unwavering for
 10 Northwestern, regardless of the consequences, the
 11 two commitments based on our constitutional rights
 12 and religious freedom. As an institution, we will
 13 put Christ first as Lord and Savior of our lives
 14 and, secondly, the Bible is the final authority that
 15 really shows us and -- shows us light on how we
 16 should live our lives. So those are the two
 17 commitments, those unwavering commitments that the
 18 board has established that will always stand.
 19 Q. Has the board ever indicated why it believes
 20 allowing nonChristian kids who are in high school to
 21 take PSEO courses on campus would be a bad thing?
 22 MR. BAXTER: Objection,
 23 mischaracterizes the evidence.
 24 You can answer.
 25 THE WITNESS: Not to my knowledge. I

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1 have not heard of the argument of why it would be a
 2 bad thing. The -- I think the statement that has
 3 been made clear is that Northwestern will continue
 4 to follow our foundational beliefs and keep to our
 5 declaration.
 6 BY MR. TIMMERMAN:
 7 Q. Turning back if we could to Exhibit 4 on page 6 of
 8 8, under the Educational Framework section, the last
 9 sentence, it says, "To this end, the curriculum is
 10 designed to assist students in the pursuit of truth
 11 as revealed in God's word and in the living truth
 12 revealed in His creation and sustaining work in the
 13 world." Do you see that?
 14 A. Yes.
 15 Q. Does that educational framework tenet apply to
 16 undergraduate courses?
 17 A. Let me read that again.
 18 No, this does not apply. So this
 19 statement would apply to traditional students. Now,
 20 because the courses that students take have been
 21 sort of scrubbed to ensure that they are
 22 nonsectarian, it would not apply to our PSEO
 23 students on campus.
 24 Q. My question, though, is would it apply to
 25 undergraduate students?

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1 A. Absolutely.
2 Q. Would it apply to general education courses that
3 undergraduate students take?
4 A. So yes, and I can clarify.
5 Q. Sure.
6 A. There are certain components that are added to some
7 of the general education courses, which has some
8 elements and conversations that are discussed in
9 class where it would be viewed from the lens of --
10 you know, from a biblical worldview, how do you see
11 this as a believer? How can you continue in the
12 lifestyle with integrity if you are put in this
13 position or when you are in this profession? So
14 those type of conversations happen for our
15 traditional students.
16 Q. In general education courses?
17 A. Generally, yes, generally.
18 Q. And there are traditional students who are in
19 general education college courses with high school
20 students, correct?
21 A. Yes. Yes, you are correct. So there are PSEO
22 classes -- well, classes that PSEO students
23 participate in alongside general traditional
24 students.
25 Q. So with respect to those classes that are shared

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1 where this requirement exists with respect to
2 traditional undergraduate students that the
3 curriculum is designed in the pursuit of God's
4 truth --
5 A. Mm-hmm.
6 Q. -- is that also a core of the educational curricular
7 framework for the class that -- for the PSEO
8 students participating in those classes?
9 A. So the classes can be taught from a biblical
10 worldview. However, I go back to the assessment,
11 the expectation. For a PSEO student to even be
12 eligible to sit in the classroom, so those
13 courses -- it's not just the course. So it's the
14 course, the curriculum and the outcome of those
15 courses have been audited to ensure that they are
16 nonsectarian. These are courses that are submitted
17 by the department chair to ensure that, okay, in my
18 department, these are the classes that would be
19 PSEO-eligible, and then APCC looks at those classes
20 to ensure that they are indeed APCC-eligible for
21 PSEO students to sit in those classes.
22 There are some courses that are not
23 accessible to PSEO students even though they may be
24 general courses, but these are courses that are,
25 most of the time, particular to a certain department

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1 like nursing or some of our business classes where
2 it's mostly, you know, limited sections, where there
3 are not enough seats, so they usually give priority
4 to upper classmen students.
5 Q. So, for example, in these courses we have been
6 talking about with a mix of traditional
7 undergraduate and PSEO students, is there a
8 different syllabus depending on if you're a PSEO
9 student or a traditional student?
10 A. It's the same. It's the same.
11 Q. What about grading, is there different grading?
12 A. Grading would be the same. So, again, those
13 nonsectarian courses that traditional students would
14 sit in and PSEO students are allowed to sit in, it
15 would be the same curriculum. It's not different,
16 it would be the same -- it would be the same
17 syllabus, it would be the same outcome for those
18 specific ones.
19 We have, I would say, 100-plus courses,
20 and PSEO students have access to a limited number of
21 those courses; and the ones that PSEO students have
22 access to are, again, the ones defined as
23 nonsectarian.
24 Q. Okay.
25 A. That is the practice and the expectation.

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1 Q. Let's talk a little bit about the -- actually, let's
2 do this next. This will be 5.
3 (Northwestern Deposition Exhibit 5 was
4 marked for identification by the court
5 reporter and attached hereto.)
6 MR. BAXTER: Just for the record, this
7 is Loe document 123.
8 MR. TIMMERMAN: And 124, correct.
9 BY MR. TIMMERMAN:
10 Q. It looks like you've had a chance to review it.
11 Have you ever seen this document before?
12 A. No, I have not.
13 Q. Were you involved in any correspondence with any
14 Minnesota legislators concerning the PSEO law last
15 year?
16 A. Not at all.
17 Q. Involved in any meetings where that was discussed?
18 A. No.
19 Q. So if you turn to the -- under the first heading
20 here, if you turn to the third bullet point, it says
21 in that sentence that Northwestern exercises its
22 constitutional religious rights to educate based on
23 biblical principles. You would agree with that,
24 right?
25 A. I would, yes.

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1 Q. And Northwestern wants to provide PSEO education to
 2 students who desire the same thing, correct?
 3 **MR. BAXTER:** Objection, the document
 4 speaks for itself.
 5 If you have a view, you can provide it.
 6 **THE WITNESS:** Yeah, I would need more
 7 context because, again, PSEO education at
 8 Northwestern, even though -- if we're referring
 9 specifically to on-campus students, even though we
 10 ask them to sign the declaration, for us to even get
 11 PSEO credit reimbursement from the State of -- the
 12 Department of Education, these courses have to be
 13 nonsectarian.
 14 Now, the definition, like I said, was
 15 defined by the MDE and we submit these courses and
 16 credits, it's reviewed by the Department and, if
 17 there's any error, they will send it back to us, we
 18 will make the corrections; but if there is remotely
 19 any course that has any kind of sectarian content,
 20 we don't get paid. So that's why I would want to
 21 understand the context behind this statement here.
 22 **BY MR. TIMMERMAN:**
 23 Q. Okay. So you submit all of your PSEO syllabi --
 24 **A. Mm-hmm.**
 25 Q. -- to MDE?

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1 **A. MDE approves the courses, yes. So we have a**
 2 **department that works within MDE to ensure that**
 3 **those courses are sectarian -- are nonsectarian, I'm**
 4 **sorry.**
 5 Q. What information does the school provide to MDE for
 6 MDE to make that determination?
 7 **MR. BAXTER:** Objection, outside the
 8 scope.
 9 If you know, you can answer.
 10 **THE WITNESS:** So I can speak to
 11 reimbursement. So I'm not sure how it works with
 12 initially when these courses are evaluated, but,
 13 generally, it would be the abbreviated course
 14 syllabus, the description of those courses and the
 15 outcomes. Those are submitted to MDE for review.
 16 **BY MR. TIMMERMAN:**
 17 Q. Do you know whether course syllabi are ever
 18 submitted to MDE?
 19 **A. I don't know.**
 20 Q. And who prepares the abbreviated course
 21 descriptions?
 22 **A. So the abbreviated course descriptions are**
 23 **consistent all across, so these are prepared by the**
 24 **academic departments.**
 25 Q. So the professors?

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1 **A. So it would be the department chairs and the**
 2 **professors. Now, professors have academic autonomy**
 3 **to flesh out a syllabus as it aligns to the**
 4 **discipline and their background. So, for example,**
 5 **if we're doing a course in US History, there would**
 6 **be a professor who has more interest in a particular**
 7 **area under US History, the abbreviated course**
 8 **syllabus is provided by the academic department, and**
 9 **then the professor will flesh it out with content.**
 10 **Textbooks are generally the same. Outcomes are the**
 11 **same. Grading outcomes are the same.**
 12 **Sometimes a professor might add an**
 13 **extra reading to that particular syllabus just to**
 14 **ensure, you know, that it kind of aligns with their**
 15 **strength and their background and their interests.**
 16 **So that is the rule. Again, there is the**
 17 **abbreviated version and then professors can add**
 18 **content.**
 19 **Now, I will say every syllabus most of**
 20 **the time is reviewed by department, by the**
 21 **department chair, and that is the practice, that is**
 22 **generally the practice.**
 23 Q. And what about at the APCC level, are those --
 24 **A. Yes.**
 25 Q. Is the APCC reviewing syllabi or is the APCC

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1 reviewing course descriptions?
 2 **A. So they do review the syllabi and the course**
 3 **descriptions. That is the practice. If there is a**
 4 **course that might have slipped past or they missed**
 5 **something, again, there would be human error, but**
 6 **the hope is that at some point that is caught, at**
 7 **some point.**
 8 **MR. BAXTER:** I would just caution the
 9 witness generally to let Mr. Timmerman finish his
 10 questions --
 11 **THE WITNESS:** Right.
 12 **MR. BAXTER:** -- before you attempt to
 13 answer them.
 14 **THE WITNESS:** Okay.
 15 **BY MR. TIMMERMAN:**
 16 Q. So who is on the APCC?
 17 **A. I believe it is made up of department chairs and**
 18 **faculty members and representation from the**
 19 **enrollment PSEO office.**
 20 Q. Do you know who is in charge of the APCC?
 21 **A. I don't know.**
 22 Q. Are there any written guidelines that are provided
 23 to the APCC or created by the APCC for use in
 24 determining whether a course is sectarian or
 25 nonsectarian?

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1 A. I believe there is, yes.
 2 Q. Have you ever seen that document?
 3 A. I have seen one. Those guidelines, language that's
 4 taken from the Department of -- Minnesota Department
 5 of Education.
 6 Q. Yeah, and we'll go over that in a little bit, but
 7 above and beyond, I guess what I'm asking is, is
 8 there any internal documentation that the APCC uses
 9 to assess syllabi and course descriptions in
 10 determining whether or not they have remained
 11 nonsectarian?
 12 A. I have not seen one. Again, I'm not part of the
 13 APCC, but for a committee like that to be effective,
 14 there would be some guidelines, but I have not seen.
 15 I don't have access to it.
 16 Q. Okay. How does Northwestern go about marketing or
 17 advertising PSEO, particularly for its on-campus
 18 PSEO?
 19 A. Well, we use the same process that we do for online.
 20 Most of the time it's brochure, so Queens collateral
 21 promotional pieces. PSEO, we have on-campus once a
 22 year PSEO events. We just had one last week, so
 23 it's called PSEO On Purpose. We invite prospective
 24 families to campus and we tell them about our PSEO
 25 program. We have done advertising through mostly

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1 social media. We have used platforms like Facebook,
 2 Instagram. We have also done advertising through
 3 radio, so Northwestern -- the Northwestern radio
 4 through KTIS.
 5 Q. Is that 98.5?
 6 A. Yes, 98.5. I'm just trying to think. We've done
 7 email communication campaigns targeting names that
 8 we buy from, you know, ACT, SAT --
 9 Q. Okay.
 10 A. -- bodies. So these would be students who would
 11 qualify as jurors or seniors -- or high school
 12 sophomores, juniors and seniors. So we have done
 13 that.
 14 Q. So it's just names that ACT and SAT --
 15 A. Yeah, ACT and SAT.
 16 Q. -- sell to colleges?
 17 A. Yeah, they do.
 18 Q. I had no idea.
 19 A. We had attended events where we have been present
 20 and have set up tables, exhibits for our programs.
 21 Q. What kinds of events?
 22 A. There is -- so these are called information nights.
 23 So schools will generally invite -- and it would be
 24 public schools and private schools would invite
 25 universities who offer PSEO, would invite them to

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1 their information sessions, students and families,
 2 and that usually happens in an evening, like a
 3 Tuesday or Wednesday evening. So we had
 4 opportunities to set up tables at various schools.
 5 Q. Have those been public schools?
 6 A. Both.
 7 Q. Both?
 8 A. It doesn't matter, both public and private.
 9 Q. And do you advertise on any other radio stations
 10 other than 98.5?
 11 A. I don't know specifically for PSEO, but Northwestern
 12 has advertised on the radio besides 98.5.
 13 Q. And is there, for lack of a better term, a target
 14 audience that you're looking for for on-campus PSEO?
 15 A. No target audience for PSEO both on campus and
 16 online. We actually don't have any differentiating
 17 way that we do advertising. It's all done to
 18 residents of the state, you know, juniors and
 19 seniors who would qualify for PSEO.
 20 Q. Any outreach to the homeschool community?
 21 A. If there is any specifics -- so there is a
 22 conference called MACHE. I don't remember what the
 23 acronym was, but we found that with the MACHE
 24 conference it's so popular that it's not just
 25 homeschool families that attend that, so it's open

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1 to everyone. That would be specific, but that's not
 2 targeting homeschool families, no.
 3 Q. Do you have any idea of the on-campus students --
 4 and I'll represent to you that if you turn to
 5 page 2, it says that Northwestern has 325 on-campus
 6 students for the 2022-23 academic year.
 7 A. Mm-hmm.
 8 Q. Do you have any idea how many of those students come
 9 from a homeschool environment as opposed to a public
 10 or private traditional school?
 11 A. Yeah, I don't have the exact percentage, but it
 12 would -- I don't have the exact percentage, but we
 13 do have families that come from homeschool, those
 14 students.
 15 Q. Would you say it's more than 10 percent?
 16 A. I don't know.
 17 Q. Turning back here to this Exhibit 5 if we could for
 18 a moment, kind of in that same sentence we were just
 19 looking at, it says, you know, that Northwestern
 20 wants to provide PSEO education to students who
 21 desire the same thing without risking the culture.
 22 Do you see that?
 23 A. Mm-hmm.
 24 Q. Do you have any idea what is meant here by "risking
 25 the culture"?

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1 **MR. BAXTER:** Objection, calls for
 2 speculation, outside the scope.
 3 You can answer if you have an opinion.
 4 **THE WITNESS:** I don't have any idea
 5 what that is.
 6 **BY MR. TIMMERMAN:**
 7 Q. From your perspective as the representative here
 8 today to testify, would allowing nonChristian
 9 students to take PSEO on campus at Northwestern risk
 10 the culture?
 11 **MR. BAXTER:** Objection, vague.
 12 You can answer if you have an opinion.
 13 **THE WITNESS:** I don't have an opinion.
 14 **BY MR. TIMMERMAN:**
 15 Q. Okay. Then the next paragraph talks about -- I
 16 guess you could describe it as a hypothetical where
 17 a more local student could apply and get accepted
 18 without fully realizing the culture?
 19 **A. Mm-hmm.**
 20 Q. Have you been a part of any conversations where that
 21 hypothetical has been discussed?
 22 **A. No, I have not.**
 23 Q. Is that a concern, from your perspective, that
 24 Northwestern has about opening up PSEO to
 25 nonChristian students?

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1 **A. I don't have an opinion on that. I haven't been a**
 2 **part of a conversation related to that.**
 3 Q. I'm just trying to square this, because you
 4 testified earlier that, you know, one of the
 5 concerns is having students who don't fit in end up
 6 at Northwestern for PSEO on campus, and I think
 7 maybe the word you were looking for is "ostracized,"
 8 that people could feel ostracized, but -- I don't
 9 think I even have a question there, so you can let
 10 that go.
 11 Let's turn -- I'd like to talk next
 12 about the actual application process. So pretend
 13 like I am a high school junior who wants to apply
 14 for PSEO on campus at Crown. How do I start?
 15 **A. Well, I don't know what Crown's application process**
 16 **is.**
 17 Q. I'm sorry, that's for tomorrow.
 18 **A. That's okay.**
 19 Q. So at Northwestern?
 20 **A. So it would start with the standard requirement for**
 21 **all PSEO students where you fill out an application**
 22 **and you submit your transcript. There's a minimum**
 23 **GPA requirement. You submit it all the same. If**
 24 **you choose to submit a test score, we will take it.**
 25 **Otherwise, it's not required, so it's test-optional.**

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1 **So that would be the general set-up.**
 2 **So the students then would have the**
 3 **option to apply for on-campus or online. If they**
 4 **are choosing the on-campus application, the**
 5 **additional piece of that would be to check those**
 6 **boxes. So the first one asks about your personal**
 7 **relationship with Christ and the second box asks**
 8 **about your standing, whether you believe that the**
 9 **Bible is the final and true authority.**
 10 **Then there is the next point where you**
 11 **are asked to write an essay, so there are two**
 12 **questions, two essay questions. One is centered**
 13 **around your faith in Christ and then the second one**
 14 **asks about how you believe that the Northwestern**
 15 **community will impact your spiritual growth. I**
 16 **can't remember the exact, how it's phrased, but**
 17 **those two questions.**
 18 **Then there's another part to the**
 19 **application where the student has to submit a video**
 20 **essay and then there are a couple of questions that**
 21 **just ask about -- the whole point of the essay is**
 22 **to -- just to see how the student can advocate for**
 23 **themselves. And then --**
 24 Q. Is there a topic that's provided for the essay or is
 25 it kind of free association?

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1 **A. There are a couple of free association. I think**
 2 **they maybe select -- from three questions, they**
 3 **select one or two. It's more like what activities**
 4 **do you participate in in high school, that sort of**
 5 **thing.**
 6 **Then there is the last part that asks**
 7 **that you have read the declaration and then you sign**
 8 **it and then you click "Submit."**
 9 Q. Do you have to provide references, as well?
 10 **A. Excuse me, yes, so there are two references. There**
 11 **is the academic reference and then there is the**
 12 **spiritual reference section, too.**
 13 Q. So is it possible for someone to just lie on that
 14 application and click the boxes and indicate that
 15 they believe in Jesus Christ and write an essay or
 16 give a video essay about topics that are relevant or
 17 selected and then gain admission?
 18 **A. It's possible, yes.**
 19 Q. Has that happened?
 20 **A. I don't know if it's happened for PSEO, not to my**
 21 **knowledge.**
 22 Q. Okay. Has it happened for traditional
 23 undergraduate?
 24 **A. I have heard of at least one instance and, again,**
 25 **that's heard.**

1 Q. Okay.
2 A. **But I -- I cannot confirm that.**
3 Q. What happened to that person?
4 A. **It's a beautiful story. So the student was not a**
5 **believer and chose Northwestern and, at the end, he**
6 **accepted Christ. And I know this from -- it's more**
7 **on the personal side when my son was a student at**
8 **Northwestern, so he shared that story.**
9 Q. Okay.
10 A. **I don't -- again, if that's an occurrence, I don't**
11 **know. I can tell you that there are students who**
12 **have checked the box and, just from my previous**
13 **testimony, who may be at some point wrestling with**
14 **their belief and then we have had one or two**
15 **conversations with students in that case, but it's**
16 **not where they are blatantly saying I do not want to**
17 **be a part of this community.**
18 Q. Do you know how -- the example that you gave, how
19 that person came to accept Christ?
20 A. **It was just through attending chapel, just through**
21 **Bible study that students have that's usually led**
22 **by -- they have communities, you know, just like**
23 **groups. So my son, you know, African American, was**
24 **part of this tapestry community, and so they had --**
25 **they did more like a twice-a-week Bible study.**

1 Q. Okay.
2 A. And he shared with me that there was this particular
3 student that accepted Christ and talked about his
4 faith, that he wasn't even a believer. Again, that
5 was from what he shared with me.
6 Q. Kind of piggybacking off of that, I guess, has there
7 ever been a discussion at Northwestern about PSEO,
8 that allowing nonChristian students on campus for
9 PSEO would provide that same opportunity for people
10 to see how beautiful a life in Christ is?
11 A. **Not a discussion that I have been a part of, no. If**
12 **that happened, no, it wasn't a discussion that I was**
13 **a part of.**
14 **MR. TIMMERMAN:** Let's mark this as 6,
15 if we could.
16 (Northwestern Deposition Exhibit 6 was
17 marked for identification by the court
18 reporter and attached hereto.)
19 **MR. BAXTER:** And just for the record,
20 this is Loe 2750.
21 **BY MR. TIMMERMAN:**
22 Q. Have you had a chance to read that?
23 A. **Yes.**
24 Q. Okay. And I'm going to ask you some questions about
25 it, mainly about the way that Dr. Johnson has

1 outlined the application process at Northwestern --
2 I almost said Crown again, I apologize.
3 A. **That's okay.**
4 Q. If I say Crown, please feel free to correct me.
5 Let's talk a little bit first about
6 just a little more context around the application
7 process. What grades are eligible to do on-campus
8 PSEO at Northwestern?
9 A. **So you're referring to the GPA, the high school GPA?**
10 Q. No, I'm sorry, what grade level, like tenth?
11 eleventh? twelfth?
12 A. **Oh, I see. You have to be in your junior year by**
13 **the time you start classes. So a tenth-grader could**
14 **potentially apply, but by the time they start, they**
15 **should be in their junior year of high school, so**
16 **junior and senior.**
17 Q. So anywhere from, I don't know, 16 to 19 years old,
18 potentially?
19 A. **Yes.**
20 Q. And what about online PSEO?
21 A. **It's the same.**
22 Q. Do online courses -- let me ask this a different
23 way. Are the same courses offered in both forums?
24 A. **Not the same courses. As much as we -- we try to,**
25 **but online courses could sometimes be different from**

1 **the on-campus courses.**
2 Q. And why would that be?
3 A. **So the distinction would be the on-campus courses**
4 **have the same catalog as the traditional courses and**
5 **there are some sections that we don't have faculty**
6 **to teach those classes on campus, so they teach them**
7 **online.**
8 **What we find is that students who are**
9 **doing online tend to have more options than students**
10 **who are taking classes on campus.**
11 Q. Okay. For the students who are taking courses that
12 are offered in both venues, the same course -- let's
13 say Algebra 1. I don't know --
14 A. **Right.**
15 Q. Is it the same syllabus for the online course as it
16 is for the on-campus course?
17 A. **It would be the same abbreviated syllabus with the**
18 **same description and outcome. It might -- if it's**
19 **the same instructor, it would be the same, it would**
20 **likely be the same full syllabus. If it's a**
21 **different instructor, there may be some variation.**
22 Q. Sure. But professors who teach the same course --
23 let me ask you this. Are there professors who teach
24 the same course online and in person?
25 A. **Yes.**

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1 Q. So those professors would be using the same syllabus
2 in both venues?
3 A. Generally. When it comes to the detail and the
4 structure for online, so there's the -- most of the
5 courses -- I would say about 99.9 percent of those
6 courses are asynchronous, which means that the
7 content is provided, the video, whatever the case,
8 and then the student will follow the curriculum in
9 their own time. It's not structured and sometimes
10 they meet once a week online at the same point in
11 time, but it's different from on campus because
12 there's the face-to-face specifically at the same
13 time and days a week. So there would be some
14 variation with the on-campus content versus online.
15 Q. What other differences are there between on-campus
16 and online in terms of rigor and expectations in
17 terms of outcomes?
18 A. So for PSEO rigor expectations, outcomes, it would
19 be the same, so there would not be a difference in
20 that, rigor meaning on the academic level it's the
21 same high-quality course and -- yeah, it should be
22 consistent. In order to keep to the integrity of
23 the program, it would be consistent.
24 Q. Okay. And how many students typically apply for
25 PSEO each year?

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1 A. I have to -- I know this number. I'll give you an
2 average. So, generally, fall is our biggest
3 application. We generally would get about maybe 250
4 students applying for on-campus PSEO. So apply
5 doesn't mean they complete the application, some of
6 those students don't; and then we admit, generally,
7 about 175 in the fall. That's for on-campus.
8 For online, at every point in time we
9 have about 1,300 students enrolled in our online
10 PSEO program.
11 Q. So considerably bigger?
12 A. Right.
13 Q. And so you said that a percentage of the
14 applications aren't completed. Do you have any idea
15 what that percentage is, roughly?
16 A. So if I -- I had mentioned about 250-ish
17 applications that we receive. Some students don't
18 meet the deadline, they decide to go somewhere else.
19 Some students decide -- again, most of the time it's
20 I couldn't get my transcript on time, so I'll wait
21 and defer to next semester; about maybe 10 percent.
22 Q. And I think you mentioned earlier that you don't
23 have insight into why they didn't complete --
24 A. Right, yeah.
25 Q. -- you just know they didn't, right?

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1 A. Right. There's a general they just didn't complete,
2 but we don't have a specific as to why they didn't.
3 Q. Okay. And I've seen a reference in some of the
4 documents to hybrid PSEO. Is that a thing?
5 A. Mm-mm. Hybrid?
6 MR. BAXTER: You need to answer yes or
7 no.
8 THE WITNESS: I'm sorry, I'm sorry.
9 BY MR. TIMMERMAN:
10 Q. Have you ever heard that term?
11 A. Nope. No.
12 Q. Okay. So your options are either -- I guess, in
13 terms of the full panoply of options for PSEO, you
14 can go on campus or you can do it online. Is there
15 any other option --
16 A. Yes.
17 Q. -- for delivery method?
18 A. Yes.
19 Q. And what is that?
20 A. You can do it onsite. So the more common term is
21 PSEO at the school, at the high school.
22 Q. And do some Northwestern students take Northwestern
23 courses at their high schools?
24 A. Yes.
25 Q. And is that -- I know the PSEO statute talks about,

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1 you know, institutions within a 40-mile radius and
2 there are some -- I think it envisions some
3 instances where it might be inconvenient.
4 A. Mm-hmm.
5 Q. Is that how PSEO at the school arises, where it's
6 just not feasible for a student to be able to
7 physically come to the campus?
8 MR. BAXTER: Objection, outside the
9 scope.
10 If you know, you can answer that.
11 THE WITNESS: Yes, that could be, and
12 I'm not sure how the structure is, but we have
13 partnerships with schools where we can offer a PSEO
14 program at their location, yes.
15 BY MR. TIMMERMAN:
16 Q. And are those written agreements?
17 A. Yes.
18 Q. And for PSEO students who take PSEO at the school,
19 are they required to sign a faith statement?
20 A. No.
21 Q. Are they required to agree to the Declaration of
22 Christian Community?
23 A. No.
24 Q. Are you aware of any secondary schools that limit
25 where their students can attend PSEO; for example,

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1 only Northwestern?

2 **MR. BAXTER:** Objection, outside the

3 scope.

4 If you know, you can answer.

5 **THE WITNESS:** We do not have an

6 exclusive agreement with any high school that we

7 partner with.

8 **BY MR. TIMMERMAN:**

9 Q. Who pays for PSEO at the school? Is that the

10 student who pays or is it reimbursed just like --

11 **A. It's the same reimbursement process.**

12 Q. And for kids who do PSEO at the school, do they ever

13 come onto campus for any reason for -- as part of

14 their PSEO education?

15 **A. No.**

16 Q. Is a student's residential proximity to Northwestern

17 considered in the application process?

18 **A. Application process for on-campus PSEO?**

19 Q. Correct.

20 **A. No, it's not.**

21 Q. And is a student's inability to commute to a

22 different institution something that you consider

23 for on-campus PSEO applications?

24 **A. No.**

25 Q. What about a student's financial status, is that

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1 something you consider for on-campus?

2 **A. No.**

3 Q. If we turn to Exhibit 6, I just want to verify a

4 couple of things. In paragraph 1 -- and I've been

5 puzzled by this and maybe you will be able to shed

6 some light on it, but the second sentence says,

7 "Certainly there is Christ-centered and

8 faith-specific language on the website, but it is

9 carefully kept off the PSEO webpage."

10 In your experience, is that an accurate

11 statement?

12 **A. No.**

13 Q. So you have no idea what Dr. Johnson is referencing

14 here? You're as confused as I am?

15 **A. Yeah, unfortunately, I don't know how he came to**

16 **that conclusion, but that is not accurate.**

17 Q. Where in the process does -- I want to take PSEO on

18 campus at Northwestern. I'm doing my application.

19 Where in the process does the declaration and the

20 boxes I need to check come into play? Is that after

21 I have completed the State application form or can

22 you just explain that a little bit?

23 **A. Yes. So when a student goes to the PSEO website and**

24 **they click "Apply" -- well, to apply is any button**

25 **at any point. Then you keep -- you are given the**

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1 **options of which venue you want to apply to. So it**

2 **could be, you know, traditional student, it -- so**

3 **you identify who you are. If you are PSEO, it will**

4 **take you to the PSEO application website that has**

5 **the different tracks for on-campus these are the**

6 **requirements, online; but it explicitly says for**

7 **on-campus students, if you choose that option, you**

8 **will be asked to lead a -- to sign a statement of**

9 **faith. So it's actually on there.**

10 Q. So you know right away?

11 **A. Yes, you know right away.**

12 Q. Okay. That made better sense to me. I just wanted

13 to verify that that was the case. So then in

14 paragraph 2(a) Dr. Johnson references things that --

15 inquiries that are made of prospective students once

16 they get into the application portal for on-campus.

17 **A. Yeah.**

18 Q. I think you've referenced one of these before.

19 "Have you entrusted yourself to Jesus Christ as your

20 Lord and Savior," that's one of the questions,

21 correct?

22 **A. Yes.**

23 Q. Then "Northwestern believes that the Bible alone is

24 the final authority and standard in all matters of

25 faith and personal conduct. Do you agree?" that's

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1 one of the questions?

2 **A. Yes, so these are the check boxes. It's the yes or**

3 **no, I don't agree boxes.**

4 Q. And the essay, it looks like -- and you referenced

5 this earlier, as well. There's a video essay and

6 then there's a written essay, correct?

7 **A. That's correct.**

8 Q. And then the written essay, you're required to write

9 a unified, coherent essay about the ways in which

10 you have seen Jesus Christ work in and through your

11 life, correct?

12 **A. Yes.**

13 Q. And then you have to attest that you have read the

14 declaration and you agree to abide by it, correct?

15 **A. That's correct.**

16 Q. And then the last requirement, at least according to

17 this email, is an inquiry about whether you have any

18 information about yourself posted in a public domain

19 that would contradict anything in the declaration,

20 correct?

21 **A. Yes, that's correct. That's accurate.**

22 Q. How long have these questions been in use as part of

23 the PSEO on-campus application?

24 **A. So the check boxes and signing the declaration, that**

25 **would be as far back as I can recall, when I was**

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1 leading this program. The essay question has been
 2 modified -- modified? No, that's not the word --
 3 yeah, modification. It has been modified over time
 4 to be consistent with making sure that it is very
 5 similar to our traditional college application for
 6 students on campus in our traditional program. The
 7 reason for that, again, is for consistency purposes,
 8 yep.
 9 Q. Okay. Do you know who created these requirements?
 10 A. It is -- so there's a standard for setting admission
 11 requirements and that's through the academic dean of
 12 the programs and enrollment/admissions.
 13 Q. Have you seen any different -- during your time at
 14 Northwestern, have you seen any different versions
 15 of this?
 16 A. The one different version would be the essay, the
 17 video essay. So that one replaced a face-to-face
 18 interview that we used to have.
 19 Q. Okay. How long did the face-to-face interview --
 20 how long was that a requirement?
 21 A. So that was -- that had been around a long time; and
 22 really why it became a video essay was because of
 23 the pandemic, just the challenge of having students
 24 come to campus and meet face to face, so it became a
 25 more streamlined process.

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1 Q. And prior to the pandemic, if anybody can remember
 2 that far back, for the face-to-face interviews was
 3 there a template or a guide of questions that the
 4 interviewer was supposed to ask the prospective
 5 student?
 6 A. I believe there was, yes.
 7 Q. Have you seen that document?
 8 A. I have, yes.
 9 Q. Okay. And then would the interviewer complete notes
 10 on how well the person did at the -- what I'll call
 11 an intake interview?
 12 A. The notes were centered around was -- the student's
 13 preparedness for the interview, the student's
 14 readiness to take college classes on campus. It was
 15 centered around those things, so it was
 16 preparedness, academically ready, ability to
 17 advocate for themselves. So it was centered around
 18 those questions.
 19 Q. Was there any religious component, any questions of
 20 a religious nature in the face-to-face interview
 21 process?
 22 A. For on-campus, yes. So the interview was only for
 23 on-campus PSEO students and it would be similar to
 24 the question that's asked here, what more of -- how
 25 do you hope this community will impact your

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1 spiritual growth, around those issues.
 2 Q. And you mentioned earlier the video essay that's now
 3 replaced the face-to-face interview. Are there any
 4 spiritual or religious questions or topics that are
 5 included in that process?
 6 A. For the video? I can't confirm that. I would have
 7 to go back and look at my notes, so I don't know. I
 8 don't know that.
 9 MR. TIMMERMAN: Do you want to take a
 10 break? We've been going about another hour and a
 11 half.
 12 MR. BAXTER: Yeah.
 13 MR. TIMMERMAN: Okay, before we dig in
 14 more to this.
 15 MR. BAXTER: That would be great.
 16 (Short break taken from 2:24 to 2:36.)
 17 BY MR. TIMMERMAN:
 18 Q. So, Ms. Cline-Cole, when we left off, we were
 19 talking about kind of these admissions questions and
 20 this process. You talked about references as being
 21 a requirement, I think you said one academic
 22 reference and one spiritual reference, correct?
 23 A. Mm-hmm, yes.
 24 Q. So one academic reference, that makes sense. Is it
 25 usually somebody from the school?

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1 A. Usually, yes, an instructor from the high school.
 2 Q. And are there guidelines on who can provide a
 3 spiritual reference?
 4 A. The guidelines are more or less somebody who can
 5 speak to your character and to your spiritual faith,
 6 so those are the specific guidelines for a spiritual
 7 reference.
 8 Q. So, for example, if an imam provided you a spiritual
 9 reference, would that be sufficient for purposed of
 10 the application process?
 11 A. If that is the student's choice, but generally, for
 12 students who are Christians, they would seek
 13 reference from people who provided spiritual
 14 guidance to them, meaning, yeah, a pastor or a
 15 priest or someone from their church.
 16 Q. And are there any prompts or topics that are
 17 provided to their reference, to the spiritual
 18 reference, this is what we need you to talk about?
 19 A. Yeah, so there are questions, and most of the time
 20 it's on a scale of one to five, so it's mostly those
 21 ranking questions and yes/no; and then I believe
 22 there's a section where the recommender could
 23 provide some context, but it's guided. Yeah, they
 24 are guided questions.
 25 Q. So there's a rating system, too?

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1 A. I don't -- so I'm trying to recall if there's
 2 actually a rating. I know there's would you
 3 recommend the student, would you -- but I don't --
 4 so there isn't a rating. No, there isn't a rating,
 5 so I'm confusing that with something else. There is
 6 not a rating system, yes.
 7 Q. So it's just a series of questions?
 8 A. Yes, it's a series of questions and most of it is a
 9 very short answer response to those questions.
 10 Q. So who -- with respect to the written essay, 250
 11 words or less, who reviews those to see if it's
 12 adequate?
 13 A. There is an academic review committee and it's read
 14 by the committee.
 15 Q. So the committee reads each submission?
 16 A. Yes.
 17 Q. And are there written criteria regarding what the
 18 committee is to look for in reviewing each of those
 19 written essays?
 20 A. So you're asking if there's a rubric. There is not
 21 a rubric.
 22 Q. There is no rubric?
 23 A. Yeah, there's not a rubric.
 24 Q. Who is on that committee?
 25 A. It's made up of the admission counselor, at least

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1 one academic advisor, the director of the dual
 2 enrollment/PSEO program, and in some cases the
 3 director of admissions.
 4 Q. So when you were in charge of admissions, is that
 5 something you would do?
 6 A. Yes. Now, for -- yes, that would be something I
 7 would do.
 8 Q. Are you aware of any instances where a student was
 9 rejected from on-campus PSEO because of the content
 10 of an essay?
 11 A. Yes.
 12 Q. Can you tell me about that?
 13 A. I'm trying to recall; it's been a while. There was
 14 one essay where the student spoke about their
 15 belief -- sorry, I'm trying to recall. It had to do
 16 with more on the -- the content on their
 17 understanding of the Christian community and the
 18 Declaration of Christian Community, I believe that's
 19 what it was.
 20 The essay -- the content that was
 21 provided showed that the student was choosing not to
 22 participate even though they had signed the
 23 declaration. So the student wrote that in their
 24 essay, that they would not participate in the
 25 community's expectation. So it was the community --

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1 I'm sorry, the community expectation. So the
 2 committee made a decision on -- they contacted the
 3 student, so there was a phone call that was made to
 4 the student to say can you help us understand your
 5 position? The subject said, yes, this is my
 6 position; and we offered the online PSEO option to
 7 the student and the student chose that option.
 8 Q. You said the "community expectation." Do you mean
 9 the declaration?
 10 A. The Declaration of Christian Community, yes.
 11 Q. Any other occasions?
 12 A. For essay, no. No.
 13 Q. What about for other things?
 14 A. It would be mostly academic, the academic
 15 requirement. When we required the test score, some
 16 students' tests fell below the minimum and way
 17 below, and also their transcripts, the total GPA
 18 fell below the minimum.
 19 Q. You mentioned test-optional. Is that
 20 SAT/ACT-optional?
 21 A. That's correct, yes, so now it's optional.
 22 Q. Who reviews the video essays, if anyone does?
 23 A. Yes, that is the committee that specifically -- the
 24 video essay is accessible to every committee member.
 25 Specifically who does, I don't know.

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1 Q. The same committee you mentioned before?
 2 A. Yes, yes.
 3 Q. Okay. Are you aware of anyone being disqualified
 4 from attending on-campus PSEO because of the content
 5 of their video essay?
 6 A. No.
 7 Q. Who reviews, if anyone, the religious or spiritual
 8 references?
 9 A. The committee does.
 10 Q. Are you aware of anyone being disqualified because
 11 of a negative or insufficient spiritual reference?
 12 A. No, I'm not aware.
 13 Q. Are you aware of any nonChristian PSEO student ever
 14 taking courses on campus?
 15 A. I'm not aware.
 16 Q. Are you aware of any LGBTQ+ PSEO student ever being
 17 admitted for on-campus?
 18 A. I'm not aware.
 19 Q. And I think you mentioned this earlier, but you
 20 don't know if -- it sounds like if you don't
 21 complete the essay, the video essay, all of the
 22 requirements, then you're deemed incomplete and
 23 you're not considered. Is that correct?
 24 A. That's correct, yes.
 25 Q. And presumably, if you check "No" to the question,

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1 Have you entrusted yourself to Jesus Christ as your
 2 Lord and Savior, you're not going to get into the
 3 on-campus PSEO, correct?
 4 **A. The process for that is a phone call to the student**
 5 **to get clarity, to understand why they checked "No"**
 6 **or why they checked "I don't know"; and then if the**
 7 **student says that, yep, it's true, I have not**
 8 **accepted Jesus Christ, I have no intention of doing**
 9 **that, then that would deem the file incomplete and**
 10 **usually we don't make a decision on the application.**
 11 Q. It just gets defaulted to incomplete?
 12 **A. Well, so we offer the online program to the student.**
 13 **In some cases the student would register for online.**
 14 **In most cases it does -- they do register for**
 15 **online, but we don't -- yeah, that's right.**
 16 Q. And what about for question number 2, if a student
 17 checks --
 18 **MR. BAXTER:** Just for the record, could
 19 we get the document in front of her first so she can
 20 see what you're talking about?
 21 **MR. TIMMERMAN:** Oh, sure.
 22 **BY MR. TIMMERMAN:**
 23 Q. This is Exhibit 6, I apologize.
 24 **MR. BAXTER:** The very bottom one.
 25 There you go.

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1 **BY MR. TIMMERMAN:**
 2 Q. There it is. So if we look at 2(a), romanette ii,
 3 "Northwestern believes that the Bible alone is the
 4 final authority and standard in all matters of faith
 5 and personal conduct," if you check "No" to that box
 6 "Do you agree" and you check "No," is it the same
 7 process, a phone call?
 8 **A. Yes. A phone call, yes.**
 9 Q. And what happens if the person says that they are
 10 sticking by their no?
 11 **A. Then it would be a denial, yes, and an offer for an**
 12 **online program.**
 13 Q. Has that happened?
 14 **A. That has happened, yes.**
 15 Q. And has it happened where someone has checked "No"
 16 or "I don't know" in response to that first question
 17 and not been admitted?
 18 **MR. BAXTER:** Objection, just vagueness
 19 as to which is the first question and --
 20 **BY MR. TIMMERMAN:**
 21 Q. Yeah, "Have you entrusted yourself to Jesus Christ
 22 as your Lord and Savior?"
 23 **A. So the process would be a phone call to the student;**
 24 **and where a student says no, I have not, I don't**
 25 **have any intention to, then it would be a denial and**

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1 **an offer for online.**
 2 Q. Okay. And my question was, are you aware of that
 3 having happened?
 4 **A. For those two instances, yes, I am.**
 5 Q. Okay. Let's focus next on the last requirement,
 6 romanette v there, if we could. Let me just start
 7 by asking, what is -- well, let me start by asking
 8 have you ever had an applicant for PSEO on-campus
 9 responding yes, that they currently have information
 10 about themselves posted in any public domain that
 11 would contradict the declaration? Has that ever
 12 occurred?
 13 **A. No.**
 14 Q. If it did occur, is there a process for what would
 15 happen next?
 16 **A. Also a phone call just to get an understanding and**
 17 **clarity on the content of what is posted on the**
 18 **public domain.**
 19 Q. Has it ever been part of the admissions process for
 20 PSEO on campus to review prospective students'
 21 social media?
 22 **A. No.**
 23 Q. Are you aware of that ever being done?
 24 **A. I'm not aware, no.**
 25 Q. Are there any written standards that dictate what

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1 would happen if -- what to look for in social media
 2 or how to react if a student responds yes to that
 3 question?
 4 **A. No, no written standards.**
 5 Q. Would that fall to the committee, as well, to sort
 6 out?
 7 **A. I believe so, yes.**
 8 Q. Have you ever had an occasion where either an
 9 academic or a spiritual reference has disclosed that
 10 a student is gay or transgender?
 11 **A. No.**
 12 Q. Are these the same questions that are asked of
 13 traditional undergraduate students for admission?
 14 **A. Yes, except for the video essay.**
 15 Q. Is it still a face-to-face for college?
 16 **A. I'm sorry?**
 17 Q. You say except for the interview?
 18 **A. The interview, yeah, the video essay is not part of**
 19 **the application for traditional students.**
 20 Q. Is it a face-to-face interview, as well?
 21 **A. No, there is no interview.**
 22 Q. No interview at all?
 23 **A. No.**
 24 Q. Is there a reason why you would require an interview
 25 for PSEO students, but not for traditional college

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1 students?
 2 **A. Yes.**
 3 Q. And why is that?
 4 **A. The decision was to ensure that the student was**
 5 **academically ready to handle the rigor of a college**
 6 **campus setting or a college level course.**
 7 Q. If a student disclosed during the application
 8 process that they were Christian, but had gay
 9 parents, would that have any bearing on their
 10 ability to be admitted?
 11 **A. No.**
 12 Q. Are PSEO students required to belong to a church?
 13 **A. No.**
 14 Q. Ostensibly, though, if you have to have a spiritual
 15 reference, you have to have a connection to a
 16 religious institution, correct?
 17 **A. Some affiliation, yes.**
 18 Q. Has Northwestern ever considered eliminating these
 19 admission requirements?
 20 **A. Not in a serious context, no.**
 21 Q. In a nonserious context?
 22 **A. If I can explain?**
 23 Q. Sure.
 24 **A. It was more a reaction context. I believe it was**
 25 **when the language was added to the Bill, so there**

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1 **was just conversation just within campus about that**
 2 **conversation.**
 3 Q. But, ultimately, the -- I think you said the board
 4 decided to keep it, correct?
 5 **A. Yes.**
 6 Q. Are you aware of any faculty or staff at
 7 Northwestern that think that these admission
 8 requirements are unnecessary?
 9 **MR. BAXTER:** I'm going to object as
 10 outside the scope.
 11 If you know, you can answer.
 12 **THE WITNESS:** I was not aware of any
 13 faculty and I am not aware of any current employed
 14 faculty.
 15 **BY MR. TIMMERMAN:**
 16 Q. Any former faculty?
 17 **A. I became aware during the preparation for the**
 18 **deposition, yes.**
 19 Q. Who is that?
 20 **A. Ken Kaiser (phonetic).**
 21 Q. Let's talk next, if we could, about the curriculum
 22 and course materials at Northwestern for PSEO
 23 courses. You mentioned that there is some
 24 difference between online versus on-campus just
 25 based on a variety of factors. Is there a catalog

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1 that's available on Northwestern's website that
 2 indicates which PSEO courses are offered?
 3 **A. It is -- yes. There is a catalog with -- a**
 4 **traditional college catalog. There is also an**
 5 **online PSEO catalog. I'm not sure if that's**
 6 **available for public access, but students who are**
 7 **enrolled in the PSEO program do have access to that**
 8 **catalog. Again, I don't know on which platform it**
 9 **is available, whether it's public domain or just**
 10 **within the institution's domain.**
 11 Q. Is that -- so the traditional undergraduate catalog,
 12 that would apply to the on-campus students, correct?
 13 **A. Yes, there is -- yes.**
 14 Q. And that is available online, I think?
 15 **A. It is. It is available online.**
 16 Q. And is the online catalog -- I have not -- I will
 17 just represent that I have not seen that. Is that
 18 something that is updated periodically?
 19 **A. It is, yes.**
 20 Q. Who decides what PSEO courses are offered on campus?
 21 **A. It's a partnership with the Department of Education**
 22 **and Northwestern, more the academic personnel. So I**
 23 **would say, I believe, it would be the provost's**
 24 **approval along with the academic -- the director of**
 25 **the academic PSEO program and the APCC.**

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1 Q. And is it your understanding that PSEO courses
 2 offered on campus have to meet the graduation
 3 requirements of the high schools?
 4 **A. That's correct.**
 5 Q. How do you ensure that that happens?
 6 **A. We have professional academic advisors who are**
 7 **trained and they have worked with schools, with**
 8 **Department of -- Minnesota Department of Education**
 9 **to ensure that those requirements are fulfilled.**
 10 Q. Okay. So is there a dialogue? If I'm a student and
 11 I want to take on-campus PSEO, is there a dialogue
 12 between academic advising staff and my high school
 13 staff?
 14 **A. Yes.**
 15 Q. Okay. To ensure that I'm not taking courses that
 16 don't count?
 17 **A. Right, yes.**
 18 Q. So is it your understanding that all courses
 19 provided through on-campus PSEO qualify for high
 20 school graduation requirements for kids who are
 21 going to school?
 22 **A. Not all courses. So there are courses that will**
 23 **meet the basic high school graduation requirements**
 24 **that they take first and then other courses are**
 25 **available to students.**

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1 Q. And those other courses, are they undergraduate
 2 courses?
 3 A. Yes.
 4 Q. Okay. Is there any difference between the
 5 curriculum in the courses that meet high school
 6 graduation requirements as opposed to those that
 7 don't?
 8 A. No, there is not a difference, and I can explain a
 9 little bit further.
 10 Q. Yeah, that would be great.
 11 A. So an instance where a student, in particular, if I
 12 recall, did two years of on-campus PSEO, took the
 13 first year to complete his high school requirements,
 14 because the equivalence is one college credit is
 15 equivalent to -- or one semester, I'm sorry, one
 16 semester of a college course is equivalent to one
 17 academic year of a high school course. So, for
 18 example, if a student has to take two years of
 19 physics, one semester of physics will apply.
 20 So the student completed his high
 21 school requirement and then the second year he was
 22 able to take courses that were related to a major of
 23 interest. For example, he took data analytics,
 24 that's not required for graduation, and then some
 25 other courses that he could take that he had access

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1 to from Northwestern.
 2 Q. And were those courses part of the undergraduate
 3 portfolio or did he actually veer into --
 4 A. No, they were a part of the undergraduate portfolio,
 5 yes.
 6 Q. Okay. Were they part of the gen. ed. portfolio or
 7 were they part of the --
 8 A. They were all part of the gen. ed. nonsectarian.
 9 Q. Are professors at Northwestern tenured?
 10 A. Some are; not all. The adjunct professors are not
 11 tenured.
 12 Q. And you mentioned earlier that Northwestern has some
 13 agreements with secondary institutions to provide
 14 PSEO at the schools?
 15 A. Yes.
 16 Q. Do you know what schools those agreements are with?
 17 A. So I can list maybe a couple. There are ten high
 18 schools that Northwestern has partnerships with,
 19 Legacy, Southwest Christian, Heritage Academy -- I
 20 should know more than this -- South -- there's
 21 another one in Burnsville called South High School,
 22 there is New Life Academy in Woodbury, there is
 23 St. Cloud Christian High School, and then a few
 24 other ones I can't recall.
 25 Q. Is Marantha one of them -- or Maranatha?

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1 A. Oh, Maranatha? I don't know. I'm not sure, yeah.
 2 Q. Okay. And all of these other schools that you just
 3 listed, are these all Christian education schools?
 4 A. Yes, they are.
 5 Q. All private schools?
 6 A. All private schools, yes.
 7 Q. And I think you mentioned this earlier, but does
 8 Northwestern have an exclusive PSEO agreement with
 9 any of these schools?
 10 A. No.
 11 Q. Do you know what other institutions these schools
 12 have agreements with?
 13 MR. BAXTER: I'll object as outside the
 14 scope.
 15 But if you know, you can answer.
 16 THE WITNESS: I wouldn't say
 17 agreements, but students from all of these schools
 18 are able to participate in PSEO programs that are
 19 offered through the Minnesota State Colleges and
 20 Universities.
 21 BY MR. TIMMERMAN:
 22 Q. Who at Northwestern sets kind of curricular
 23 standards? Is there a group that sets standards for
 24 all courses?
 25 A. Yes. That would be under the purview of academia.

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1 So the provost leads that effort and she has a
 2 couple of committees that do that, yeah, committees
 3 that do that.
 4 Q. For these schools that you have partnership
 5 agreements with, do you know, is it just their
 6 students --
 7 A. Yes.
 8 Q. -- who are able to take PSEO courses on their
 9 campuses?
 10 A. Yes.
 11 (Northwestern Deposition Exhibit 7 was
 12 marked for identification by the court
 13 reporter and attached hereto.)
 14 BY MR. TIMMERMAN:
 15 Q. Showing you what's been marked as Exhibit 7 to your
 16 deposition, feel free to take a minute to read it.
 17 MR. BAXTER: And this is Loe 761 for
 18 the record.
 19 BY MR. TIMMERMAN:
 20 Q. Have you had a chance to review that?
 21 A. Yes.
 22 Q. My first question for you is, who is Ann Sorenson?
 23 A. She's a faculty member in the Film and Communication
 24 Department.
 25 Q. Is she a member of the cabinet?

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1 A. No, she's not.
 2 Q. Any idea why she would be attending a cabinet
 3 meeting?
 4 A. She -- I believe she's currently -- she currently
 5 serves as the president of the faculty board or
 6 committee, I think, so she represents all faculty.
 7 Q. Is it a union?
 8 A. No, it's not.
 9 Q. Are you -- Northwestern I don't think is unionized,
 10 at least as I --
 11 A. No, it's not.
 12 Q. Okay. And is it Dr. Sorenson?
 13 A. I don't think so. She does have a terminal degree
 14 in media, but it's an MFL, master of -- MFA, master
 15 of fine arts.
 16 Q. And she indicates here that one large reason that
 17 people choose Northwestern is the Christian
 18 worldview. Would you agree with that statement?
 19 MR. BAXTER: I'm going to object as out
 20 of the scope.
 21 You shouldn't speculate, but if you
 22 know or have an opinion, you can provide it.
 23 THE WITNESS: Students have shared that
 24 they chose Northwestern because of the Christian
 25 worldview, yes.

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1 BY MR. TIMMERMAN:
 2 Q. And were you involved at all in any outreach to
 3 parents or families about the legislation?
 4 A. No, I wasn't.
 5 Q. You weren't involved in any -- in drafting any
 6 template communications for parents or families?
 7 A. No, I wasn't. I wasn't.
 8 Q. You weren't, okay. Do you know who was?
 9 A. I believe that was through the Marketing Department,
 10 yeah.
 11 Q. Okay. Are students in PSEO courses on campus
 12 required to pray?
 13 A. No.
 14 Q. Are you aware of that ever being the case?
 15 A. Not that I'm aware of, no.
 16 Q. Are they required, PSEO students on campus, required
 17 to engage in devotion?
 18 A. No, they are not required to engage in devotion.
 19 Q. Are you aware of students ever being graded on --
 20 PSEO students on campus being graded on their
 21 participation in prayer and devotion?
 22 A. I am not aware of a student being graded on their
 23 participation, a PSEO student.
 24 Q. And you mentioned earlier that professors create the
 25 course syllabi?

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1 A. They flesh it out, so they add context, but the
 2 abbreviated version is also quite robust. The
 3 professor might add maybe a couple more reading
 4 materials and things that are relevant to their area
 5 of expertise.
 6 Q. And I think you mentioned the abbreviated version is
 7 the version that's shared with MDE, correct?
 8 A. Generally, yes.
 9 Q. And do you know what MDE does with that information?
 10 A. No.
 11 Q. Is the APCC in charge of PSEO curricular
 12 development?
 13 A. I don't know.
 14 Q. Or is that still at the professor level?
 15 A. I don't know if the APCC is part of that.
 16 Q. Are there any written rules or guidelines on how to
 17 develop curriculum or syllabi for a course, for a
 18 PSEO course?
 19 A. I don't know that.
 20 Q. Any rules or guidelines that are provided to
 21 professors about how to ensure that their courses
 22 and course syllabi are nonsectarian?
 23 A. I'm not aware of any written rules or guidelines,
 24 but I know through my conversation with Heidi Hoefs
 25 that there's a thorough examination and auditing of

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1 these -- of these syllabi and the course context to
 2 ensure that it's nonsectarian.
 3 Q. Do you know whether there's ever been an occasion
 4 where a syllabus has been returned to a professor
 5 because the APCC determined that it was sectarian?
 6 A. I don't know. I have not heard of that situation.
 7 Q. Who would know that?
 8 A. Heidi would know.
 9 Q. And is there any -- let me ask this. Does the APCC
 10 then approve syllabi for professors to use for
 11 upcoming semesters?
 12 A. In the context of reviewing and auditing those
 13 syllabi, I believe so, yes.
 14 Q. Is it expected at Northwestern that on-campus
 15 courses that PSEO students can take will include the
 16 Bible as a text?
 17 A. No.
 18 Q. Is it expected that syllabi will include biblical
 19 references?
 20 A. No.
 21 Q. Biblical quotes or citations?
 22 A. No, it is not expected.
 23 Q. Is it expected at Northwestern that courses
 24 on-campus PSEO students take will have a prayer or
 25 devotional at the beginning of the class?

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1 **A. It is not expected. That's not the standard.**
 2 Q. Is that something that occurs?
 3 **A. Not common practice that I'm aware of, no.**
 4 Q. Are you aware of any courses that PSEO students can
 5 take on campus that start with a prayer or
 6 devotional?
 7 **A. No, I'm not.**
 8 Q. Are you aware of instructors ever -- professors ever
 9 being told that they should create multiple syllabi
 10 for courses?
 11 **A. No.**
 12 Q. Aware of multiple syllabi ever being created by
 13 professors for the same course at the same time?
 14 **A. I'm not aware.**
 15 Q. Who decides on things like what textbooks and
 16 materials and handouts and things will be in a
 17 course?
 18 **A. That would be the department chair and the**
 19 **committee, as part of the academic committee, but**
 20 **I'm not sure who -- the department chair does.**
 21 Q. Are there any standards or guidelines provided to
 22 department chairs to aid them in that process?
 23 **A. I don't have any knowledge of that.**
 24 Q. Is there an expectation that course materials
 25 provided will have a biblical viewpoint?

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1 **A. No, there is no expectation.**
 2 Q. Is that something --
 3 **A. If we're talking about PSEO on campus, that's not**
 4 **the expectation.**
 5 Q. Does that ever occur or has that ever occurred where
 6 source materials via texts or handouts had an
 7 exclusively Christian viewpoint for PSEO on-campus
 8 classes?
 9 **A. Exclusively Christian, not that I'm aware of.**
 10 **Again, not a common practice that I'm aware of.**
 11 Q. We talked about this earlier today, so let's just
 12 look at it together, then.
 13 (Northwestern Deposition Exhibit 8 was
 14 marked for identification by the court
 15 reporter and attached hereto.)
 16 **BY MR. TIMMERMAN:**
 17 Q. This is Exhibit 8 and it's MDE 1569. Have you had a
 18 chance to review this, Ms. Cline-Cole?
 19 **A. I'm looking at it now.**
 20 Q. Okay. Please take your time.
 21 **A. Okay.**
 22 Q. Have you had a chance to review that?
 23 **A. Yes.**
 24 Q. Is this the statement of assurance that you
 25 referenced earlier?

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1 **A. Yes.**
 2 Q. Do you know, are these submitted annually to MDE?
 3 **A. Yes, they are.**
 4 Q. And did you submit these when you were in Heidi's
 5 role?
 6 **A. No, I didn't.**
 7 Q. Okay. Have you ever had any involvement in the
 8 process of assuring that courses are nonsectarian?
 9 **A. No.**
 10 Q. Excuse me, that --
 11 **A. No, I have not.**
 12 Q. That would be the APCC again, correct?
 13 **A. Yes.**
 14 Q. Do you know how long this has been required of
 15 Northwestern to submit?
 16 **A. The earliest I can remember dates as far back, based**
 17 **on documents that I have read, that I have access**
 18 **to, 2008 that I've seen.**
 19 Q. So there are -- I've only ever seen this one version
 20 of this document. Have you seen other versions?
 21 **A. Not this document, but the requirement that the**
 22 **courses that are offered to PSEO students are**
 23 **nonsectarian, yes.**
 24 Q. Okay. So that's been clear since 2008?
 25 **A. Yes.**

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1 Q. Do you know how long Northwestern has submitted an
 2 annual assurance like this one?
 3 **A. I don't know.**
 4 Q. Have you ever seen any other annual assurances like
 5 this one?
 6 **A. No.**
 7 Q. Is it your understanding, as Northwestern's
 8 representative, that MDE does not reimburse for PSEO
 9 courses that are nonsectarian?
 10 **A. Yes.**
 11 Q. And in this document, if we look at the second and
 12 third bullet points -- let me start at the top.
 13 I'll just read it all. "I hereby certify that all
 14 courses offered to high school students for the
 15 2022-2023 academic year through the PSEO program are
 16 nonsectarian in nature. Further, these courses are
 17 not:" Bullet 1, "Specifically for education of
 18 students (a) to prepare them to become ministers of
 19 a particular religion; (b) to enter upon some
 20 religious vocation; or (c) to prepare them to teach
 21 theological subjects."
 22 Bullet number 2, "Based upon one
 23 particular set of religious beliefs."
 24 And bullet number 3, "Intended to
 25 propagate or promote any one religious belief or

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1 viewpoint." Did I read that correctly?
2 **A. Yes.**
3 Q. Do you believe that all of Northwestern's PSEO
4 courses meet these three requirements?
5 **MR. BAXTER:** Objection, calls for a
6 legal conclusion.
7 If you want to offer an opinion -- if
8 you have an opinion, you can offer it, but you
9 shouldn't speculate.
10 **THE WITNESS:** Based on the rigorous
11 process and the high process of integrity that
12 Heidi's office goes through and in partnership with
13 the Minnesota Department of Ed, yes, I believe that
14 courses offered to our PSEO students are
15 nonsectarian.
16 **BY MR. TIMMERMAN:**
17 Q. Are you aware of any PSEO courses offered that are
18 based upon one particular set of religious beliefs?
19 **MR. BAXTER:** Objection, vague.
20 You can answer if you have an opinion.
21 **THE WITNESS:** By this definition, no.
22 **BY MR. TIMMERMAN:**
23 Q. Are you aware of any PSEO courses that are intended
24 to propagate or promote any one religious belief or
25 viewpoint?

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1 **MR. BAXTER:** Same objection, vague and
2 ambiguous.
3 You can answer.
4 **THE WITNESS:** I'm not aware.
5 (Northwestern Deposition Exhibit 9 was
6 marked for identification by the court
7 reporter and attached hereto.)
8 **MR. TIMMERMAN:** MDE 524.
9 **BY MR. TIMMERMAN:**
10 Q. Showing you Exhibit 9 to your deposition,
11 Ms. Cline-Cole, have you seen this document before?
12 **A. I have not, no.**
13 Q. Do you know what this document is?
14 **A. This looks like a promotional piece, I believe, that**
15 **was created by the Marketing Department. I don't**
16 **know, it has Northwestern's crest on it.**
17 Q. Okay. And the last heading on this document is
18 "Christ-centered." Do you see that?
19 **A. I do, yes.**
20 Q. And that section reads, "All of our professors have
21 a foundation of faith and teach from a biblical
22 worldview." Do you see that?
23 **A. I do, yes.**
24 Q. Would you agree with me that, according to this
25 advertisement for PSEO, that Northwestern's courses

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1 are intended to promote one religious belief or
2 view?
3 **MR. BAXTER:** Objection,
4 mischaracterizes and calls for a legal conclusion.
5 **THE WITNESS:** No, it does not.
6 **BY MR. TIMMERMAN:**
7 Q. You don't believe it does?
8 **A. I don't believe it does.**
9 Q. Would you agree, based on -- again, you can look
10 back to the last exhibit.
11 **A. Yes.**
12 Q. I believe you may have it here. This is
13 Northwestern telling the world our professors in
14 PSEO courses teach from a biblical worldview,
15 correct?
16 **A. Yes.**
17 Q. Would you agree that, at least with respect to this
18 advertisement, it's promoting that Northwestern's
19 PSEO courses are based upon one particular set of
20 religious beliefs?
21 **MR. BAXTER:** Objection, vague and
22 ambiguous.
23 **THE WITNESS:** I don't believe so, and I
24 can explain.
25 **BY MR. TIMMERMAN:**

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1 Q. Sure.
2 **A. The courses that are defined as nonsectarian are**
3 **based on, again, assessing the students, it's based**
4 **on outcome, it's based on grading. None of the**
5 **courses that we offer to PSEO students were graded**
6 **based on one particular religion, based on their**
7 **faith, based on their creed. So that is why I**
8 **believe that the courses that have been approved as**
9 **defined by the Department of Ed, Minnesota**
10 **Department of Ed, are nonsectarian by that**
11 **definition that Northwestern offers.**
12 **So it is two different things. Every**
13 **course that's taught at Northwestern is taught from**
14 **a biblical worldview. However, courses that PSEO**
15 **students are allowed to take are not graded based on**
16 **their faith and the outcome of those courses meet**
17 **the nonsectarian definition, if that helps.**
18 Q. It doesn't. So, I mean, I -- you're distinguishing
19 between taught from a biblical worldview and
20 grading.
21 **A. Mm-hmm.**
22 Q. How does the outcome of the course make it
23 nonsectarian?
24 **MR. BAXTER:** Objection, calls for a
25 legal conclusion.

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1 You shouldn't speculate, but if you
 2 have an opinion, you can answer.
 3 **BY MR. TIMMERMAN:**
 4 Q. Based on what you just testified.
 5 **MR. BAXTER:** Same objections.
 6 **THE WITNESS:** The definition of
 7 "nonsectarian" is all based on outcome. So the
 8 first bullet point talks about preparing students to
 9 become ministers of a particular religion based upon
 10 one particular set of religious beliefs. That's
 11 measuring the student's religious beliefs and
 12 grading them based on that belief.
 13 The same thing with the second one,
 14 intending to propagate or promote any one religious
 15 belief or viewpoint to that student, and then the
 16 outcome of that is to say that I will grade you
 17 based on that particular religious belief. So that
 18 is the definition by the Department of Ed.
 19 **BY MR. TIMMERMAN:**
 20 Q. Do you see the word "outcome" referenced anywhere in
 21 Exhibit 8?
 22 A. No.
 23 Q. In fact, it references "courses," correct?
 24 A. Mm-hmm, yes.
 25 Q. So just to close the loop on this, as Northwestern's

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1 representative, it's your opinion or your testimony
 2 that PSEO courses are nonsectarian because students
 3 aren't graded on anything religious in nature?
 4 **MR. BAXTER:** Objection,
 5 mischaracterizes --
 6 **BY MR. TIMMERMAN:**
 7 Q. I was just going to ask you, is that a fair
 8 characterization?
 9 A. PSEO courses taught at Northwestern are nonsectarian
 10 because Northwestern has done a thorough review
 11 process with a partnership with the Department of
 12 Education to approve these courses all based on the
 13 course curriculum, the syllabus and the outcome.
 14 All courses taught through Northwestern's PSEO
 15 program are nonsectarian.
 16 Q. Does Northwestern keep copies of the course
 17 descriptions that it provides to MDE?
 18 A. Yes.
 19 Q. How far back?
 20 A. I don't know how far back.
 21 **MR. TIMMERMAN:** Let's mark this as 10.
 22 (Northwestern Deposition Exhibit 10 was
 23 marked for identification by the court
 24 reporter and attached hereto.)
 25 **BY MR. TIMMERMAN:**

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1 Q. Ms. Cline-Cole -- go ahead.
 2 **MR. BAXTER:** Just for the record, I'm
 3 going to note this is MDE 2078 through MDE 2085.
 4 **BY MR. TIMMERMAN:**
 5 Q. And I will represent to you that I received this
 6 anonymously.
 7 A. Mm-hmm.
 8 Q. Are you ready?
 9 A. I am.
 10 Q. Have you seen this document before?
 11 A. It was brought to my attention, yes.
 12 Q. Okay. And this purports to be a spring semester
 13 2021 Public Speaking syllabus; is that correct?
 14 A. That's correct, yes.
 15 **MR. BAXTER:** And I'll just object for
 16 lack of foundation, no authentication, but go ahead.
 17 **BY MR. TIMMERMAN:**
 18 Q. Sure. Do you know who Dr. Robert Allen is?
 19 A. No, I don't.
 20 Q. Do you know whether this was a PSEO course?
 21 A. I do not know whether it was.
 22 Q. Do you know that Melinda Loe's and Dawn Erickson's
 23 children took this course in PSEO at Northwestern?
 24 Any reason to dispute that?
 25 A. I can't answer that.

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1 Q. Okay. So if you turn to the second page, if you
 2 will, paragraph 9 says, "All students will
 3 participate in opening class with a short devotional
 4 and prayer." Did I read that correctly?
 5 A. Yes.
 6 Q. And five points next to that, correct?
 7 A. Yes.
 8 Q. If you turn to the next page -- actually, if you --
 9 yes, please turn to the next page. You see here
 10 again is a reference to devotion, five points,
 11 correct?
 12 A. I see that, yes.
 13 Q. And that's in the grading rubric for this class,
 14 correct?
 15 **MR. BAXTER:** Objection, calls for
 16 speculation.
 17 If you know, you can answer.
 18 **THE WITNESS:** From the rubric, the
 19 grading rubric, it does look like it, yes.
 20 **BY MR. TIMMERMAN:**
 21 Q. So it looks like students who took this course were
 22 graded upon their participation in prayer and
 23 devotion, correct?
 24 **MR. BAXTER:** Objection, calls for
 25 speculation.

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1 **THE WITNESS:** Based upon what's
2 presented to me, yes, I see that.
3 **BY MR. TIMMERMAN:**
4 Q. Do you know if the APCC reviewed this syllabus?
5 A. **I can't speak directly to whether the APCC reviewed**
6 **this syllabus, but I will add that this is not**
7 **standard practice. This is not something that's**
8 **allowed and accepted. If the APCC had caught this,**
9 **it would never make it on the syllabus.**
10 Q. Well, who could I talk to on the APCC who could tell
11 me more about this?
12 A. **Well, I keep referring to the academic director,**
13 **Heidi Hoefs.**
14 Q. Okay. Do you know if Northwestern was reimbursed
15 for this course by MDE?
16 A. **I don't know.**
17 Q. Do you know if this is a general education course?
18 A. **I don't know.**
19 Q. Do you know if this course is still being taught?
20 A. **The Public Speaking course is still being taught,**
21 **but I don't know who is -- who the instructor is.**
22 Q. And the course description is right on page 1, if
23 you could go back. Gosh, I need new readers, sorry.
24 In the last full paragraph of the course description
25 before Course Learning Outcomes, the second sentence

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1 reads, "As Christians ..." Starting there, do you
2 see that?
3 "As Christians, we should model God's
4 example of communication and glorify our Savior by
5 displaying excellence in communication
6 opportunities." Did I read that correctly?
7 A. **Yes.**
8 Q. Would you agree that this is promoting a particular
9 religious viewpoint?
10 A. **As it appears, but I will emphasize this is**
11 **absolutely not standard practice and would not be**
12 **allowed.**
13 Q. Okay. But as it appears, it is, correct?
14 **MR. BAXTER:** Objection, vague and
15 ambiguous.
16 **BY MR. TIMMERMAN:**
17 Q. As this is drafted, it's promoting a particular
18 religious viewpoint, correct?
19 **MR. BAXTER:** Same objection.
20 **THE WITNESS:** I see this as the
21 instructor's worldview and it's a biblical worldview
22 position that the instructor has taken.
23 **BY MR. TIMMERMAN:**
24 Q. In fact, the instructor is assuming that everyone
25 who takes his class is Christian, correct, and he

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1 starts that "As Christians," correct?
2 **MR. BAXTER:** Objection, calls for
3 speculation.
4 **THE WITNESS:** If this is an on-campus
5 PSEO course, then that is the assumption, yes.
6 (Northwestern Deposition Exhibit 11 was
7 marked for identification by the court
8 reporter and attached hereto.)
9 **BY MR. TIMMERMAN:**
10 Q. If you would turn back to the last exhibit, if you
11 would, do you see that there's one text listed as a
12 requirement for that course?
13 A. **Yes.**
14 Q. "An Essential Guide to Public Speaking," Second
15 Edition, by Q. Schultze?
16 A. **Yep.**
17 Q. I'll represent to you that this is that second
18 edition. This is the text from that PSEO course.
19 Have you ever seen this before?
20 A. **No.**
21 Q. Let's turn to the introduction. Could you read this
22 sentence for the record, please, starting with "I
23 wrote ..."?
24 A. **"I wrote this book for Christians who want to learn**
25 **public speaking with faith, skill and virtue. I**

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1 **learned public speaking by doing it myself and**
2 **mentoring others and teaching at Christian**
3 **universities and seminaries."**
4 Q. I just want to go through some of the chapter
5 headings and subheadings with you, of which there
6 are surprisingly many for a relatively short book.
7 One of them is, starting on page 7, "Listen for
8 God's Calls." Did I read that correctly?
9 A. **Yes.**
10 Q. One of them, starting on page 58 is, "No Christian
11 Nonnegotiables." Did I read that correctly?
12 A. **Mm-hmm.**
13 Q. And one of them, starting on page 93, is "Imitate
14 the Ethos of Jesus Christ." Did I read that
15 correctly?
16 A. **Yes.**
17 Q. Would you agree that this book promotes a particular
18 religious view?
19 **MR. BAXTER:** I'm going to object for
20 lack of foundation, authentication, calls for a
21 legal conclusion.
22 If you have an opinion, you can answer
23 it.
24 **THE WITNESS:** I would need to read the
25 book to agree.

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1 **BY MR. TIMMERMAN:**
 2 Q. Would you agree that it's based upon, at least from
 3 what you've seen, one particular set of religious
 4 beliefs?
 5 **MR. BAXTER:** Same objections.
 6 **THE WITNESS:** And I would respond the
 7 same, I would need to read the book in order to come
 8 to that conclusion.
 9 **BY MR. TIMMERMAN:**
 10 Q. Does the APCC vet textbooks to make sure that the
 11 textbooks and the course materials are nonsectarian?
 12 **A. I believe that's part of the integrity of the group,**
 13 **yes, and I will emphasize again this particular**
 14 **course content, the outcome that's listed on here,**
 15 **being that it's only 5 points out of 470 points,**
 16 **it's not standard and it is not acceptable for a**
 17 **nonsectarian approved PSEO course.**
 18 Q. How do you know it's not standard?
 19 **A. Based on conversations that Heidi and I have had and**
 20 **she's talked about the process of reviewing and**
 21 **auditing and vetting these courses and because this**
 22 **is outcome-based, it is not standard practice.**
 23 Q. Have you personally reviewed any other syllabi to
 24 ensure that it's nonsectarian?
 25 **A. I have not.**

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1 Q. Have you reviewed any source materials referenced as
 2 texts for any PSEO course to ensure that it's
 3 nonsectarian?
 4 **A. I have not.**
 5 Q. Are you aware of any other syllabi in which
 6 requirements like these are captured?
 7 **A. I am not, not for a PSEO on campus.**
 8 **(Northwestern Deposition Exhibit 12 was**
 9 **marked for identification by the court**
 10 **reporter and attached hereto.)**
 11 **MR. BAXTER:** I'll note this is MDE 1055
 12 through 1058; and, I'm sorry, is this Exhibit 11 or
 13 12?
 14 **MR. TIMMERMAN:** It's 12.
 15 **MR. BAXTER:** Twelve, okay.
 16 **BY MR. TIMMERMAN:**
 17 Q. Have you had a chance, Ms. Cline-Cole, to review
 18 that?
 19 **A. Yes, I have.**
 20 Q. I guess my first question is, what the heck is this?
 21 Could you just explain, to the best of your
 22 knowledge, what this is?
 23 **MR. BAXTER:** I'll just object for lack
 24 of authentication and foundation, but go ahead.
 25 **THE WITNESS:** So I'm going by the URL

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1 here. Spring of 2016, a course that was taught
 2 during the 2016 semester. It says "Undergraduate
 3 Pathways" and this is one of the learning platforms
 4 that is available, so it would be -- it's MOD, so
 5 that would be Moodie, so Moodie is a learning
 6 platform, so this would be an online course.
 7 **BY MR. TIMMERMAN:**
 8 Q. So this would be for an online PSEO course?
 9 **A. It appears that some of the discussion and content**
 10 **is posted on the Moodie platform, yes.**
 11 Q. Okay. So this would -- would these modules be
 12 available to students taking on-campus PSEO?
 13 **MR. BAXTER:** Objection, calls for
 14 speculation.
 15 You can answer if you know.
 16 **THE WITNESS:** I don't.
 17 **BY MR. TIMMERMAN:**
 18 Q. Do you know if those are the online PSEO students?
 19 **A. That's the thing, I don't know. There's nothing**
 20 **here to provide that context for me. Undergrad**
 21 **Pathways also covered all of our online platforms,**
 22 **including -- and it was accessible to adult degree**
 23 **completion students, so I don't know.**
 24 Q. Can you tell what class this is from?
 25 **A. It says it's economics somewhere here. It's an econ**

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1 **class, it looks like.**
 2 Q. Do you know who Dan Moalusi is?
 3 **A. No, I don't.**
 4 Q. Is economics a course that's available to PSEO
 5 students on campus?
 6 **A. Let me think. Currently, I believe not. It falls**
 7 **under the Business Department and is limited to**
 8 **students who can take those business courses.**
 9 Q. Has it ever been part of the PSEO on-campus
 10 portfolio?
 11 **A. I can't speak to that. I don't know.**
 12 Q. Has it ever been part of the online PSEO?
 13 **A. I don't know.**
 14 Q. Okay. Who would know?
 15 **A. This is 2016? There would have to be some**
 16 **investigation in previous course catalogs. I would**
 17 **have to find out that. Heidi was not an employee at**
 18 **the time and she was not in her current role. The**
 19 **person who was in that position is no longer at**
 20 **Northwestern.**
 21 Q. Who was that?
 22 **A. Dr. Tanya Groves (phonetic); yes, Dr. Tanya Groves.**
 23 Q. She was Heidi's predecessor?
 24 **A. In that role, yes.**
 25 Q. Do you know where she is now?

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1 A. I believe she currently works at the University of
 2 Minnesota.
 3 Q. Do you know, did she leave on amicable terms?
 4 A. Mm-hmm, yes.
 5 Q. Are you aware, I guess just generally speaking, of
 6 any online prayer rooms that are hosted by
 7 professors in PSEO courses?
 8 A. No, I am not aware.
 9 Q. Who pays for on-campus PSEO -- at Northwestern, who
 10 pays the students' expenses?
 11 A. Could you clarify when you say "students' expenses"?
 12 Q. Yeah, like, who pays for the textbooks, for example?
 13 A. The State does.
 14 Q. Is there a tuition for on-campus PSEO?
 15 A. No.
 16 Q. But the State reimburses Northwestern based on the
 17 amount of --
 18 A. Credits, yes.
 19 Q. -- credits that are taught, correct?
 20 A. That's correct.
 21 Q. And how does that work functionally? How does the
 22 reimbursement process work?
 23 A. Yeah, so Heidi, her office will submit the
 24 reimbursement request, which includes a SharePoint
 25 document of all of the credits that Northwestern

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1 offered to the PSEO programs, the
 2 nonsectarian credits. The State will review that
 3 and look for any errors. There's also a State form.
 4 It's called an NOSR form, Notice of Registration --
 5 NOSR, Notice of Student Registration. So each
 6 student has to submit an NOSR perform per semester.
 7 So it's a lot of paperwork. So that's
 8 all submitted to MDE. There's usually several back
 9 and forth where MDE reviews that and they send it
 10 back for errors and then Heidi submits it. So
 11 it's -- it's quite a long process, and then once
 12 everything is approved, then Northwestern receives
 13 those funds and that's sent to the accounting
 14 office.
 15 Q. Okay. Is it always, like, lagging behind after --
 16 A. Mm-hmm, always.
 17 Q. Okay. Do all students who attend on-campus PSEO at
 18 Northwestern attend free of charge, nothing
 19 out-of-pocket for them?
 20 A. If it's strictly only PSEO on-campus courses that's
 21 offered during the fall and spring semesters, yes,
 22 it's all free of charge.
 23 Q. Do any other students at Northwestern, aside from
 24 scholarship students, attend free of charge?
 25 A. There's some students who may be State

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1 grant-eligible based on their FAFSA, but most
 2 students do pay tuition at some point.
 3 Q. Is it fair to say that the only way for students to
 4 attend PSEO on campus at Northwestern for free is if
 5 the State pays for it? Is that correct?
 6 A. Yes.
 7 Q. Is PSEO revenue a significant source of revenue for
 8 Northwestern?
 9 MR. BAXTER: Objection, outside the
 10 scope.
 11 BY MR. TIMMERMAN:
 12 Q. If you know.
 13 A. I don't know.
 14 Q. Do you know if PSEO funds are used for anything
 15 other than the provision of education?
 16 A. I don't know that.
 17 Q. Would Mr. or Dr. Somerville know that?
 18 A. Not Mr. Somerville.
 19 MR. BAXTER: You'll want to raise your
 20 voice a little bit so the reporter and others can
 21 hear you.
 22 THE WITNESS: Okay, sorry.
 23 BY MR. TIMMERMAN:
 24 Q. Aside from its partnership with the State, has
 25 Northwestern ever offered any other PSEO courses for

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1 students?
 2 A. (Indicating.)
 3 MR. BAXTER: Was that a yes or a no?
 4 THE WITNESS: I'm trying to think of a
 5 response.
 6 MR. BAXTER: Oh, sorry.
 7 THE WITNESS: So by definition of PSEO,
 8 it is not possible to offer any PSEO course outside
 9 of the State of Minnesota. So no, that answer is
 10 no.
 11 BY MR. TIMMERMAN:
 12 Q. Unless students pay for it?
 13 A. Students cannot pay out-of-pocket for PSEO. That
 14 makes it ineligible, at last the program is, yeah.
 15 MR. TIMMERMAN: Can we take five
 16 minutes?
 17 MR. BAXTER: Sure, great.
 18 (Short break taken from 3:52 to 4:03.)
 19 BY MR. TIMMERMAN:
 20 Q. Dr. -- Ms. Cline-Cole, excuse me, we talked earlier
 21 about differences between online and on-campus PSEO
 22 course offerings, and just to be clear, are there
 23 certain courses that are available for PSEO only to
 24 on-campus students?
 25 A. I believe so, yes.

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1 Q. Do you know what those are?

2 **A. They would be -- I believe these are courses that**

3 **have some level of lab component to them, so**

4 **chemistry, physics, generally science courses.**

5 Q. Is there anything else that you can think of

6 difference-wise between online versus on-campus

7 other than what we've discussed today?

8 **A. Yeah, so it's the style of offering. Modality would**

9 **be where the face to face, so we're having a**

10 **conversation, versus the asynchronous where a**

11 **student goes and logs in and takes the class in**

12 **their own time and at their own pace.**

13 Q. Are there any rules on student speech in the online

14 community? For example, if a student posted in a

15 class forum that they don't believe in Jesus Christ,

16 does that have any repercussions?

17 **A. Absolutely not, no.**

18 Q. Would the elimination of the faith statement

19 requirements that we've talked about today, the

20 application questions and the Declaration of

21 Christian Community, would that in any way hinder

22 Northwestern's ability to educate Christian PSEO

23 students?

24 **MR. BAXTER: Objection, outside the**

25 **scope and calls for speculation.**

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1 **THE WITNESS: I don't know.**

2 **BY MR. TIMMERMAN:**

3 Q. You don't know?

4 **A. No.**

5 **MR. TIMMERMAN: Probably a better**

6 **question for a different person.**

7 That's all the questions I have; and I

8 will note before we close the record that we are

9 going to keep this deposition open, as well, with

10 our pending motion to compel and some additional

11 documents, as well. So with that note, we can close

12 it, unless you had questions.

13 **MR. BAXTER: No.**

14 **THE COURT REPORTER: Did you want to**

15 **put something on the record about Exhibit 11?**

16 **MR. TIMMERMAN: Yes, we do want to put**

17 **this on the record, good point. So from the -- "An**

18 **Essential Guide to Public Speaking, Exhibit**

19 **Number 11, if you would, please, as part of the**

20 **record, reproduce the cover and then pages romanette**

21 **ix through romanette xviii and text pages 1 and 2,**

22 **and that was the entirety of -- and more of what was**

23 **introduced.**

24 **THE COURT REPORTER: Read and sign?**

25 **MR. BAXTER: Yes, we will.**

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1 **THE COURT REPORTER: And, Counsel,**

2 **transcript format preference for you?**

3 **MR. BAXTER: We -- do you mean do we**

4 **want a four-by-four or --**

5 **THE COURT REPORTER: Yes.**

6 **MR. BAXTER: Yeah, I think we want a**

7 **regular and a four-by-four.**

8 **(Deposition concluded at 4:07 p.m.)**

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1 VERIFICATION OF DEPONENT TO TRANSCRIPT

2 I, ANITA CLINE-COLE, do hereby verify

3 that I have read the foregoing transcript consisting

4 of the preceding 179 pages and do further verify

5 that it is a true and complete transcript of the

6 testimony given by me on January 30, 2024, (except

7 for the following, stating page and line number and

8 the reason for the change).

Page	Line	Change/Addition	Reason
10	1.		
11	2.		
12	3.		
13	4.		
14	5.		
15	6.		
16	7.		
17	8.		
18	9.		
19	10.		

20

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23

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25

ANITA CLINE-COLE
DATED: _____

Notary
Signed before me this ____ day of _____, 20____.

COLLEEN M. SICHKO, RPR

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1 STATE OF MINNESOTA) ss.
2 COUNTY OF DAKOTA)
3
4 Be it known that I took the deposition
5 of UNIVERSITY OF NORTHWESTERN - ST. PAUL by ANITA
6 CLINE-COLE, pursuant to Federal Rule of Civil Procedure
7 30(b)(6) on the 30th day of January, 2024, at Suite 1100,
8 445 Minnesota Street, Saint Paul, Minnesota;
9 That I was then and there a Notary
10 Public in and for the County of Dakota, State of
11 Minnesota, and that I was duly authorized to administer an
12 oath;
13 That the witness, before testifying,
14 was first duly sworn to testify the truth and nothing but
15 the truth;
16 That the testimony was recorded by
17 myself and transcribed into a computer-aided transcript
18 and that the transcript is a true record of the testimony
19 given by the witness to the best of my ability;
20 That the cost of the original
21 transcript has been charged to the party noticing the
22 deposition, unless otherwise agreed upon by Counsel, and
23 that copies have been made available to all parties at the
24 same cost, unless otherwise agreed upon by Counsel;
25 That I am not related to any of the
parties hereto nor interested in the outcome of the
action;
That the reading and signing of the
deposition by the witness was not waived; that the
original transcript will be retained by Mr. Timmerman.
WITNESS MY HAND AND SEAL THIS 1st day
of February, 2024.

/s/Colleen M. Sichko
COLLEEN M. SICHKO
Registered Professional Reporter

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Should you have any questions, please do not hesitate to
contact me.
Sincerely,
SHADDIX & ASSOCIATES

/s/Colleen M. Sichko
Colleen M. Sichko
Registered Professional Reporter

Enclosure
cc: Jeff Timmerman, AAG
Madeleine Demeules, AAG

SHADDIX & ASSOCIATES STENOGRAPHIC COURT REPORTERS
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February 1st, 2024

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THE BECKET FUND
1919 Pennsylvania Ave. NW., #400
Washington, D.C. 20006

Re: Melinda and Mark Loe, et al., v. Willie Jett,
et al.

Deposition of UNIVERSITY OF NORTHWESTERN - ST. PAUL,
by ANITA CLINE COLE, taken January 30, 2024

Dear Counsel:

A copy of the above-referenced deposition is enclosed,
along with the reading and signing certificates. When
the witness has completed the reading and signing,
please return the executed certificate to me at
reporters@janetshaddix.com and copy all counsel of
record.

In accordance with the Rules of Civil Procedure, if I do
not receive the executed certificate within thirty (30)
days pursuant to the rules, I will send the unsigned
original transcript to Mr. Timmerman for proper filing.

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